

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

**TOWNSHIP TRUSTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12
EAST,**

Plaintiff,

vs.

**LYONS TOWNSHIP HIGH SCHOOL
DISTRICT NO. 204**

Defendants

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) **No. 13 CH 23386**
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) **Judge Sophia H. Hall**
) **Calendar 14**
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PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East ("TTO"), by its undersigned counsel, MILLER, CANFIELD, PADDOCK & STONE, PLC, for its Motion for Summary Judgment (the "Motion") against the defendant, Lyons Township High School District No. 204 ("LT"), states as follows:

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CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
CHANCERY DIV.
CLERK
MURPHY BROWN

I. INTRODUCTION

The TTO is entitled to summary judgment on its claim for declaratory judgment that: (a) LT failed to pay \$511,068.60 for its own annual audits during fiscal years 1994 through 2012; (b) LT failed to pay its proportionate share, totaling \$2,628,807, of the Treasurer's compensation and expenses during fiscal years 2000 through 2013; and (c) LT was over allocated investment income of \$1,386,267.03 during the period 1995 through 2012. All of these claims arise as a result of unauthorized conduct by the former Treasurer, Robert Healy, which resulted in LT being given unlawful financial benefits, to the corresponding detriment of other school districts, and in violation of the Illinois School Code. The TTO also moves for summary judgment on LT's nine (9) affirmative defenses.

This is a long Motion, in part because it has been broken into many different sections, many of which start on new pages, to help the reader visually. There is a short section of general facts at the beginning of this Motion. Next, each of the TTO's three (3) claims are given their own section, each claim having its own facts and legal argument. The argument respecting the affirmative defenses comes last. In total, not counting the cover page, introduction and conclusion, or the statements of facts, there are twenty-four (24) pages of argument: two (2) for the first claim, eleven (11) for the second claim, three (3) for the third claim, and eight (8) for the affirmative defenses.

II. STATEMENT OF GENERAL MATERIAL FACTS

A. The TTO: Township Trustees and Treasurer.

1. The Township Trustees.

Plaintiff is a body politic comprised of three (3) Township Trustees who are elected by voters within Lyons Township. (See Amend. Compl. and Answer, Exs. 1 and 2 at ¶¶1, 5; 105 ILCS 5/5-2.) The Illinois School Code provides that “the school business of all school townships having school trustees shall be transacted by three trustees....” 105 ILCS 5/5-2. In other words, the three Trustees comprise the board that governs the TTO. The Trustees also appoint the Lyons Township School Treasurer (“Treasurer”). (Exs. 1 and 2 at ¶¶1, 5; 105 ILCS 5/8-1.)

2. The Treasurer.

The Treasurer provides financial services for eleven (11) school districts: LT; Western Springs School District 101; LaGrange School District 102; Lyons School District 103; Cook County School District 104; LaGrange School District 105; Highlands School District 106; Pleasantdale School District 107; Willow Springs School District 108; Indian Springs School District 109; and Argo Community High School District 217. (See Exs. 1 and 2 at ¶6.) In total, they consist of 38 schools educating about 20,000 students. (See *id.* at ¶7.) As LT notes, the Treasurer during the time period relevant to this lawsuit was Robert Healy. (Motion at 4.)

The Treasurer also provides financial services for two (2) other bodies: the LaGrange Area Department of Special Education (“LADSE”), which serves 15 school districts; and the West 40 Intermediate Service Center, which serves 40 school districts. (See Exs. 1 and 2 at ¶6.)

The Treasurer is statutorily obligated to, *inter alia*, “[c]ollect from the township and county collectors the full amount of taxes levied by the school boards in his township;” “[b]e responsible for the receipts, disbursements and investments arising out of the operation of the

school districts under his supervision; and “[p]ay all lawful orders issued by the school board of any district in his township.” 105 ILCS 5/8-17(a)(2); (a)(3); (a)(9). In other words, the Treasurer is required by statute to collect and manage the funds of each school district, invest those funds, and pay the bills of those districts as they direct. The Treasurer is the “only lawful custodian” of these funds. 105 ILCS 5/8-7.

The Treasurer is not statutorily authorized to enter into contracts generally on behalf of the TTO. Section 8-17 sets forth the duties of the Treasurer, but none of them include the duty to contract generally. Section 8-7, rather, authorizes the Treasurer to enter into only contracts:

[r]egarding the deposit, redeposit, investment, reinvestment or withdrawal of school funds, including, without limitation, agreements with other township and school treasurers, agreements with community college districts...and agreements with education service regions....

105 ILCS 5/8-7.

B. The Treasurer Is A Zero-Sum Office.

The Treasurer is compensated for his or her services, and the Treasurer has certain expenses of office, *e.g.*, leased office space, additional staff, computers and office supplies. (Exs. 1 and 2 at ¶24; Affidavit of S. Birkenmaier, Ex. 3, at ¶7.) The *only* source of revenue is the member districts. (See 105 ILCS 5/8-4; Ex. 3 at ¶71.) The Plaintiff does not have a tax base or any other source of revenue. (Ex. 3 at ¶71.)

The School Code requires that each district “shall pay a proportionate share” of the Treasurer’s compensation and expenses of office. 105 ILCS 5/8-4. This share “shall be determined by dividing the total amount of all school funds handled by the township treasurer by such amount of funds as belong to each such...district.” *Id.* The Treasurer sends annually an invoice to each district for its proportionate share for the prior fiscal year. (Ex. 3 at ¶¶72-73.)¹

¹ The Treasurer uses a fiscal year running from July 1 to June 30. (Ex. 3 at ¶4.)

LT acknowledges it has about 25% of the total funds the Treasurer handles. (Motion at 4.) This means LT is statutorily required to pay about 25% of the Treasurer's expenses in any given year. It does not matter if LT thinks this is a good bargain or a bad bargain. *If LT does not "pay" (in cash) its annual invoice from the Treasurer setting forth LT's proportionate share, this necessarily creates a shortfall in funding, i.e., a public deficit at the TTO.* The Plaintiff has no other source of revenue to "make up" the shortfall. This means, absent relief from this Court, the other school districts have to pay the amounts LT does not pay.

As noted above, one of the Treasurer's duties is investing the property taxes collected. (See 105 ILCS 5/8-17(a)(9).) The Treasurer is permitted to combine (*i.e.*, pool) for investment purposes the monies each district owns. 105 ILCS 5/8-7. These monies must be "accounted for separately in all respects, and the earnings from such investment shall be separately and individually computed and recorded, and credited to the...school district...from which such investment was required." *Id.* At all times relevant, the Treasurer did, in fact, pool investments. (Ex. 3 at ¶6.) Each member district has its share of the pooled investments and its share of the investment income, and the Treasurer is obligated to properly credit these amounts to each member district. If LT was over-allocated investment return, this *necessarily* means that the remaining districts were under-allocated investment return. (Dep. of M. Thiessen, Exhibit 4, at 114:20-115:11).

Understanding the zero-sum nature of the Treasurer's office is critical. The Treasurer is a custodian of funds that belong to others, and the only way the Treasurer pays its bills is by invoicing each district for its proportionate share of those bills. A good analogy is that the Treasurer is the trustee of a trust with over a dozen different beneficiaries. The *corpus* of the trust is public tax dollars. If one beneficiary gets too much or pays too little, the other beneficiaries

necessarily suffer the inverse of that, in violation of the School Code. There is no way around this logic, no matter how much LT wishes otherwise. The only wrinkle in this case is that the trustee and each of the beneficiaries are public bodies.

C. LT.

LT is one of the eleven (11) school districts that the Treasurer serves. As a public body, LT is governed by a Board of Education consisting of 7 members elected by the public for 2-year terms. (Dep. of T. Kilrea, Exhibit 5, at 16:19-18:13.) The Board has various committees, including its Finance Committee. (*Id.* at 22:19-24) The most senior person charged with running the day-to-day operations of LT is the Superintendent, Timothy Kilrea. (*Id.* at 18:21-19:9) Underneath the Superintendent are various Directors; germane to this case is one such position, the Director of Business Services. (*Id.* at 19:10-21:11.)

III. STANDARD ON SUMMARY JUDGMENT

Summary judgment is appropriate where the pleadings, depositions, affidavits and admissions show there is no genuine dispute of material fact and the moving party is entitled to judgment as a matter of law. 735 ILCS 5/2-1005. Particularly appropriate to this case, the construction, interpretation and legal effect of written instruments are questions of law properly decided on a motion for summary judgment. *Premier Title Co. v. Donahue*, 328 Ill. App. 3d 161, 164 (2d Dist. 2002); *Briarcliffe Lakeside Townhouse Owners Ass'n v. City of Wheaton*, 170 Ill. App. 3d 244, 249 (2d Dist. 1988).

IV. CLAIM 1 – LT’s FAILURE TO PAY FOR ITS ANNUAL AUDITS

A. Material Facts: LT Did Not Pay For Its Own Annual Audits; But Other Districts Paid For *Their Own Annual Audits And Their Share Of LT’s*.

Section 3-7 of the School Code provides that “[e]ach school district shall, as of June 30 of each year, cause an audit of its accounts to be made....” 105 ILCS 5/3-7. Each district, thereafter, “shall...submit an original and one copy of such audit to the regional superintendent of schools....” *Id.* If any district fails to do so, the regional superintendent “shall...cause such audit to be made by employing an accountant...to conduct such audit and shall bill the district for such services....” *Id.* The logical implication of this language is that the School Code requires each district to pay for its own audit, either because (a) it is the entity that “causes” the audit to be made, or (b) because it does not cause the audit to be made, and so the regional superintendent “causes” the audit to be made, and then bills the district for such audit.

During the period at issue (fiscal years 1994 through 2012), “[LT] engaged Baker Tilly and/or its predecessors-in-interest to provide these audits and other professional services, including, but not limited to, preparation of audited financial statements and independent auditor’s reports.” (Exs. 1 and 2 at ¶51.)² During this same time period, however, LT did not pay for its annual audits – rather, the Treasurer paid for those audits and treated them as an expense of the Treasurer’s office. (Exs. 1 and 2 at ¶54; Ex. 3 at ¶¶20-53.)

The result of treating the cost of LT’s audit as an expense of the Treasurer’s office is that the Treasurer thereby included this cost in his invoices to each member district. (*Id.*) This means that, on average, LT was invoiced only its proportionate share of its own audit (roughly 25% in any given year), and the other districts were invoiced for the balance. (*Id.*)

² Baker Tilly is the name of the most recent auditing firm. It had two predecessors-in-interest. For convenience, the parties have referred to the relevant firm as “Baker Tilly” regardless of timeframe.

LT has argued that the Treasurer *also* paid for the annual audit of the other districts during this same period. First, this would not have changed the fact that LT did not pay for its own audit, in violation of the School Code. Rather, it would just mean that the TTO would also have a claim it could assert against the other districts. Second, the TTO has undertaken a detailed analysis of the payment records and they establish beyond *genuine* dispute that LT's argument is not factually accurate. (*See id.*)

With three (3) isolated exceptions for which there is no seeming explanation, the Treasurer *only* paid the annual audits of LT, and not the other districts. (The Treasurer also paid for the TTO's own annual audit.) These 3 exceptions are: (a) payment of \$10,352 for the LADSE audit in fiscal year 2008; (b) payment of \$7,000 for a benefit cooperative audit in fiscal year 2011; and (c) payment of \$1,000 for a same benefit cooperative audit in fiscal year 2012. (Ex. 3 at ¶30.) The total amount of these payments is \$18,352.

The total amount that the Treasurer paid for LT's audit is \$511,068.60. (Ex. 3 at ¶53.) After 2012, when Healy left office, LT resumed paying for its own annual audit. (Exs. 1 and 2 at ¶56; Ex. 3 at ¶52.)

B. Legal Argument: LT's Failure To Pay For Its Own Annual Audits Violates The School Code.

Fairly read, the School Code requires that each district pay for its own annual audit. The School Code must be construed as a single act. *People ex rel. Bodecker v. Community Unit School Dist. No. 36*, 409 Ill. 2d 526, 532 (1951). This corresponds with the general rule that courts should evaluate statutory provisions as a whole and not focus on phrases in isolation. *People v. Glisson*, 202 Ill. 2d 499, 505 (2002). This Court may also assume that the legislature did not intend an absurd result. *Id.*

Section 3-7 of the School Code requires on its face that each district “shall cause” an annual audit to be undertaken. While not expressly identifying who should pay, the fairest reading is that each district itself should pay for its own audit that it is “causing” to be undertaken. The remainder of the Section reinforces this conclusion.

Section 3-7 further provides that if a school district does not cause an audit to be undertaken, the regional superintendent “shall cause” the audit to be done, and “shall bill” the district for the cost. This reinforces the conclusion that the cost of the audit is for the school district to bear. Any other conclusion would create an absurd result, wherein the district is *not* responsible for the cost of its audit if the district causes it, but *is* responsible for the cost if the regional superintendent causes it.

This is further reinforced by the fact that LT was the party who engaged Baker Tilly. Further, the documentary evidence establishes, with three (3) isolated exceptions during the 18-year period at issue, all of the *other* school districts paid for *their* own annual audit. This additional evidence, however, should not be necessary for this Court to interpret Section 3-7.

LT has alleged various affirmative defenses to argue that it should not now be required to comply with the School Code. For the reasons explained in Part VII of this Motion,

these affirmative defenses are insufficient. Importantly, although LT has argued that the TTO "agreed to pay" for LT's annual audits, LT has not pointed to any action by the Trustees to enter into a contract with LT on this issue. (LT attempts to do this with respect to the next claim regarding LT's failure to pay its proportionate share of the Treasurer's expenses.)

The Treasurer's impermissible payment of LT's annual audits during the period at issue resulted in the other districts each having unlawfully imposed upon them a share of LT's \$511,068.60 audit expenses. The TTO is entitled to summary judgment on this claim and this Court should issue a declaratory judgment that the Treasurer may debit \$511,068.60, representing LT's audit costs, from the monies being held by the Treasurer and allocable to LT.

As discussed at the most recent court hearing, the TTO acknowledges that if it obtains a full recovery on its first two claims, some duplication would occur and LT may then be entitled to a credit. The amount of that credit can only be determined after this Court's ruling.

V. CLAIM 2 – LT’S FAILURE TO PAY ITS PROPORTIONATE SHARE OF THE TREASURER’S EXPENSES

A. Material Facts: LT Did Not Pay Its Proportionate Share Of The Treasurer’s Expenses.

As set forth in Part II(B) of this Motion, Section 8-4 of the School Code requires each district to pay its proportionate share of the Treasurer’s compensation and expenses. 105 ILCS 5/8-4. At the close of each fiscal year, the Treasurer sends an invoice to the districts for their proportionate share. (Ex. 3 at ¶¶72-73.) There is no dispute that beginning with the invoice for fiscal year 2000 and continuing through the invoice for fiscal year 2013, LT did not pay its proportionate share.

For fiscal years 2000-2002 and 2013, LT paid a portion of its share; for the other fiscal years, 2003-2012, LT paid nothing. (Ex. 3 at ¶¶98.) The dispute is over *why* LT did not pay. LT’s theory is that in 2000, the parties entered into a contract whereby LT was permitted to offset against its proportionate share the salaries that LT was paying three (3) of its employees. The TTO responds that while the parties may have been *discussing* such an agreement, no contract was ever formed. To the extent such a contract had been formed, it would have violated Illinois law.

1. The Lisa Beckwith February 29, 2000 memorandum.

There is no disputing that Healy and the then-current LT Director of Business Services, Lisa Beckwith, were discussing various ways of addressing LT’s unhappiness that it believed it was paying too large a share of the Treasurer’s expenses.³ There is no dispute that the Trustees were aware of these discussions. The apparent end-result of these discussions was a February 29,

³ LT was unhappy paying roughly 25% of the Treasurer’s expenses because it chose not to use many of the Treasurer’s services. This is akin to parents who send their children to parochial school complaining about having to pay property taxes allocated to public school districts.

2000 memorandum prepared by Beckwith and sent to Healy. (A stand-alone copy of this memorandum is attached as Exhibit 6.)

In the Memorandum, Beckwith states the relevant "proposal:"

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

- ~~Payroll and accounts payable bank reconciliation.~~
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- Annual salary and benefit costs for 3 employees as listed below:

	Salary	OASDI		Insurance	Insurance	
	<u>99-00</u>	<u>Medicare</u>	<u>IMRF</u>	<u>Medical</u>	<u>Life</u>	<u>Total</u>
Programmer Analyst	\$41,205	\$3,152	\$3,045		\$48	\$47,450
Accounts Payable Bkkeeper	\$23,192	\$1,774	\$1,714	\$7,028	\$48	\$33,756
Payroll Bookkeeper	\$21,861	\$1,672	\$1,616		\$48	\$25,197
Total	\$86,258	\$6,598	\$6,375	\$7,028	\$144	\$106,403

An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the fiscal year.

(Ex. 6.)

The three (3) employment positions identified were already held by LT employees. LT was not going to be hiring anyone new; rather these people "were in place for years beforehand...." (Ex. 5 at 92:19-93:7.) LT believed the Treasurer should pay their salaries because LT was performing its own business services; overlooking that other districts also performed their own business services. (Dep. of E. Grimes, Exhibit 7, at 8:1-10; 28:20-29:3.)

2. The March 2000 Trustees' meeting.

On March 21, 2000, the Trustees had a board meeting. A copy of the Agenda, Minutes and attachments are Exhibit 8. Item No. 8 on the Agenda is "District 204 Business Office." (Ex. 8, p. 1) A copy of Beckwith's memorandum is part of this packet. (See Ex. 8 at p. 11.)

The Minutes reflect the relevant discussion:

Healy submitted to the Trustees the proposal from District 204 stating this office absorb certain payroll, accounts payable and computer processing expenditures by District 204. As these costs would be incurred by the Treasurer's office if Lyons Township High School were to totally utilize the facilities of the Treasurer's office. These costs would certainly be incurred. A point to be clarified is to make sure that workman's compensation is covered. A further recommendation by Trustee Hartigan is that the trustees be given an evaluation of the employee's performance for those aforementioned personnel employed at the high school.

(Ex. 8, p. 2.)

The Minutes then reflect the following action:

A motion was made by Russell Hartigan seconded by Joseph Nekola to accept the proposal given to the Lyons Township Trustees of Schools by Cook County High School District #204.

ROLL CALL: Ayes - Joseph Nekola, Russell Hartigan
Nays - None

(Ex. 8, p. 3.) (The third Trustee was absent.)

LT argues that by voting to "accept" the proposal, the Trustees formally agreed to enter into the purported contract. (Ex. 5 at at 68:13-69:20.) As argued later, this is inaccurate.

2. The June 2000 LT Board of Education meeting.

On June 19, 2000, the LT Board of Education had a meeting. A copy of its Agenda, Minutes and relevant attachments are Exhibit 9. On the Agenda, the relevant entry is Item "P," part of the "Consent Agenda," and is identified as "Township Treasurer's Invoice." (Ex. 9, p. 2.)

The Minutes describe "Action No. 8," identified as "Approval of Consent Agenda." (See Ex. 9, p. 9.) The Minutes reveal the Board voted to "approve the Consent Agenda...." (Ex. 9, p. 13.) The Consent Agenda identifies "Exhibit T" as the "Township Treasurer's Invoice." (*Id.*)

Consent Agenda Exhibit T is four (4) pages. The first page is a June 14, 2000 memorandum from Beckwith to the LT Board of Education:

-T-

MEMORANDUM

TO: Board of Education
FROM: Lisa Beckwith
DATE: June 14, 2000
SUBJECT: TOWNSHIP TREASURER EXPENDITURES

Attached is a copy of the Lyons Township High School Treasurer's bill for the 1999-2000 school year. The District's share is \$165,476, which is a 6% increase over the 1998-1999 school year. Also attached is a copy of the agreement that we made with the Treasurer, which pays the District \$106,403 for comparable services provided to other township districts but not to Lyons Township High School. Board of Education action is to approve a payment in the net amount of \$59,073.

(Ex. 9, p. 17.) The attachments to this memorandum are the next three (3) pages of "Exhibit T:" (a) a cover letter from Healy to LT enclosing the Treasurer's invoice for fiscal year 1999-2000 showing LT owes \$165,47; and (b) the prior February 2000 memorandum from Beckwith to Healy. (Ex. 9, pp. 18-20.)

LT's position is that "the [LT Board] vote approving payment of the invoice and the vote approving the contract are one, one [and] the same vote." (Ex. 5 at 61:5-23.)

B. Legal Argument: Neither Board Voted To Enter Into A Contract; If They Did, The Contract Violated The School Code And Intergovernmental Cooperation Act; And If It Violated Neither, It Was A One-Year Contract.

There are a myriad of reasons why LT's theory of this purported contract fail:

1. Neither Healy nor Beckwith had authority to enter into the purported contract.
2. The TTO Trustees did not vote to enter into a contract with LT.
3. LT's Board of Education did not vote to enter into a contract with the TTO.
4. Assuming a contract was formed, it would have violated Section 8-4 of the School Code and, thus, be unenforceable.
5. Assuming a contract was formed, and assuming it did *not* violate Section 8-4 of the School Code, it would have violated the Intergovernmental Cooperation Act and, thus, be unenforceable.
6. Assuming a contract was formed, and assuming it did *not* violate Section 8-4 of the School Code, and assuming it did *not* violate the Intergovernmental Cooperation Act, the contract would have been effective at most for 1 year (the 1999-2000 fiscal year).

1. Neither Healy nor Beckwith had authority to enter into the purported contract.

As discussed above, the School Code mandates that all TTO business be conducted by the Trustees. 105 ILCS 5/5-2. The School Code enumerates certain duties of the Treasurer, but these duties do not include entering into contracts generally. 105 ILCS 5/8-17. Section 8-7 of the School Code, rather, authorizes the Treasurer to enter into only certain types of contracts. 105 ILCS 5/8-7. These contracts are limited to those "regarding the deposit, redeposit, investment, reinvestment or withdrawal of school funds" *Id.* The purported contract whereby LT was permitted to offset its proportionate share by the salary it was paying its own employees is not such a contract. Healy did not have actual authority to agree to the purported contract; rather, only the Trustees did. *See also Matthews v. CTA*, 2016 IL 117638, ¶99 (holding the CTA may only be contractually bound by official action taken by its governing Board).

To the extent LT argues that Healy had apparent authority, such argument would fail; the doctrine of apparent authority is not applicable against public officials. *Patrick Engineering, Inc. v. City of Naperville*, 2012 IL 113148, ¶36. This is because: (a) it would leave a public body “helpless to correct errors” and “escape the financial effects of frauds and thefts by unscrupulous public servants;” and (b) persons acting with a public official are charged with knowing the bounds of his or her authority, even if the official is himself unsure. *Id.* Moreover, Beckwith acknowledged that she knew that Healy was not authorized to enter into the purported contract. (Dep. of L. Beckwith, Exhibit 10, at 96:3-23.)

Further, Beckwith herself did not have authority to enter into the purported contract. LT does not dispute that Beckwith did not have authority to contractually bind LT to this type of contract; rather, only LT’s Board could do so. (Ex. 5 at 32:11-33:6; 38:8-39:21.)

2. The Trustees did not vote to enter into the purported contract.

The Minutes reflect that at the March 2000 meeting, the two (2) Trustees present discussed the February 2000 Beckwith memorandum, which proposed that the Treasurer pay for the salary and benefits of three (3) LT employees for 1999-2000 fiscal year.

The Minutes also reflect, however, that Trustee Hartigan sought clarification of one point: to make sure worker’s compensation insurance was covered by the proposal. (Ex. 8, p. 2.) (Indeed, the memorandum does not address this point.) They also reflect that Hartigan recommended that the Trustees be given evaluations for the employees at issue. (Ex. 8, p. 2) This point of clarification and further recommendation suggests negotiation remained to be done. The “proposal,” however, was never again discussed by the Trustees.

The Minutes reflect that the Trustees voted to “accept” the proposal given to them by LT. (Ex. 8, p. 3.) LT argues this means a contract was thereby formed and Hartigan’s concerns were

moot. But in the context of a deliberative body, such as the Board of Trustees, that is not what it means to “accept” a document. Merriam-Webster defines “accept” both in regular usage and in legal usage as, *inter alia*, “of a deliberative body: to receive (a legislative report) officially (as from a committee).” (Emphasis in original) (<https://www.merriam-webster.com/dictionary/accept> and <https://www.merriam-webster.com/dictionary/accept#legalDictionary>) (July 13, 2017).

Nancy Sylvester, PRP, CPP-T, one of foremost expert parliamentarians in the United States, agrees with this usage. She reviewed the Trustees’ Minutes from 1993 through 2010, to identify if there was an established custom for how certain parliamentary-related phrases were used, in accordance with *Robert’s Rules of Order* and parliamentary practice. Her expert opinion is that “the Trustees used the word ‘accept’ as the equivalent of ‘receives’.” (Affidavit of N. Sylvester, Exhibit 11, at ¶7.)⁴ The Trustees, thus, were formally indicating their official receipt of a document. *Id.* At her deposition, she explained why it is important for a deliberative body to officially “accept” documents: “[b]ecause then it goes in their minutes that they as a group have received it, not that the TTO office somewhere received it, but that in their meeting they as a group have received that document.” (Dep. of N. Sylvester, Exhibit 11, at 54:21-55:2.)

When the Trustees entered into a contract, such as leases, agreements with other school districts, and employment contracts, they “approved” the contract. (Ex. 11 at ¶8.) While “accept” and “approve” can have the same meaning from a parliamentary standpoint, Sylvester testified that it was “beyond what I believed was a shadow of doubt” that the Trustees did not use “accept” to provide their assent to a contract. (Ex. 11 at 31:6-8.)

Sylvester also confirmed that, despite (a) the Minutes reflect Trustee Hartigan sought clarification of the worker’s compensation issue and recommended performance review, and (b)

⁴ Ms. Sylvester is unquestionably an expert. (Ex. 11 at ¶¶2-4.) LT has not disclosed an opposing expert.

that the proposal was on its face for only the 1999-2000 fiscal year, the Trustees never again discussed or voted upon the “proposal.” (Ex. 11 at ¶11.)

3. LT’s Board did not vote to enter into the purported contract.

Only LT’s Board of Education was permitted to vote to enter into the purported contract; neither Beckwith nor the Finance Committee of the Board was authorized to do so. (Ex. 5 at 22:19-24; 24:5-25:6; 32:11-33:6; 38:8-39:21.) Illinois law regulates the contractual authority and procedures of a Board of Education; it is not treated the same as a private corporation. *Wesclin Educ. Ass’n v. Board of Educ.*, 30 Ill. App. 67, 75 (5th Dist. 1975). Statutes conferring powers on a Board of Education are strictly construed as a limitation on the powers of the Board. *See id.* (holding school board without authority to enter into subject contract). A Board may never contract away obligations imposed upon it by Illinois law. 105 ILCS 5/10-20.

The June 2000 LT Board Minutes do not reflect that the Board voted to enter into a contract with the TTO. The Minutes, rather, reflect that the Board voted to authorize a single payment to the Treasurer’s in the amount of \$59,073. (Ex. 9, pp. 9-13.)

In the June 2000 memorandum, part of “Exhibit T” to the Minutes, Beckwith states that she attached “a copy of the agreement that we made with the Treasurer....” (Ex. 9, p. 17.) Of course, no agreement was actually attached. Rather, she attached a copy of *her* February 2000 memorandum to Robert Healy, which contained a proposal. (See Ex. 9, p. 20.)⁵

LT may argue that by approving payment of \$59,073, which is the net amount of LT’s proportionate share of \$165,476 less the amount of \$106,403 set forth in the LT proposal, LT was thereby agreeing to a contract. Indeed, that seems to be LT’s position. (Ex. 5 at 61:8-23.) There are several reasons why this is wrong.

⁵ Beckwith’s comment that the agreement was reached with the “Treasurer” is also telling; as discussed above, the Treasurer did not have authority to enter into this sort of contract.

First, the Agenda and Minutes reflect that all that was done was to approve payment of the Treasurer's invoice. (Ex. 9.) Second, Beckwith does not recommend in her June memorandum that LT's Board should approve a contract, rather she states "Board of Education action is to approve a payment...." (Ex. 9, p. 17.) Correspondingly, that is precisely what the Board did. Third, in her June memorandum, Beckwith states that the "agreement that we made with the Treasurer" is already attached. (Ex. 9, p. 17.) This indicates her belief and the belief of the Board that the parties had already entered into a contract and all that needed to be done was to apply an offset and pay the net amount due.

Sylvester again offers her expert opinion that, as a matter of parliamentary practice, LT did not approve a contract at this meeting. Rather, using the Consent Agenda, LT approved payment of a single invoice. (Ex. 11 at ¶12.) Use of the Consent Agenda is inappropriate to approve the purported contract at issue. *Robert's* defines the Consent Agenda as being for "routine business." (Ex. 11 at ¶13.)⁶ None of the other LT Board Minutes, however, reflect prior public discussion of this purported contract and, accordingly, it would be inappropriate to enter into such a contract through the Consent Agenda. *Id.*

4. Assuming the parties did enter into the purported contract, it would have violated the School Code and, thus, be unenforceable.

A public body cannot enter into a contract that "is *ultra vires*, contrary to statutes, or contrary to public policy." *Matthews v. CTA*, 2016 IL 117638, ¶98. The purported contract would have functionally excused LT from paying its proportionate share of the Treasurer's expenses and, thus, be *ultra vires* and/or contrary to statutory obligations under the School Code.

Section 8-4 of the School Code mandates each district "shall pay" its proportionate share of the Treasurer's expenses. 105 ILCS 5/8-4. This Section also sets forth the formula to be used

⁶ LT's Board of Education follows *Robert's*. (Ex. 5 at at 21:24-22:2.)

when calculating each district's proportionate share. LT cannot reject this formula or pick-and-choose what services it is willing to pay for. Whether LT uses the services or not, and whether LT believes it is getting a good or a bad deal, LT "shall pay" its proportionate share.

It is undisputed that during the period encompassing fiscal years 2000 through 2013, LT did not pay its full proportionate share, resulting in a total shortfall in funding of \$2,628,807. (Ex. 3 at ¶¶84-99.) LT's only argument is that it and the TTO entered into an agreement whereby LT need not pay its share, but would get a credit for the salary of certain of its own employees. The functional result of this, however, is that it excused LT from actually *paying* its share and thereby forced the other districts to pay *more than* their proportionate share.

LT's argues it essentially engaged in barter. Let us imagine that in a given year, the total cost of the Treasurer's office was \$1 million; LT's share would be about 25% of that. This would mean that LT "shall pay" \$250,000. LT's theory is that, in essence, it instead provided services to the TTO valued at \$250,000, and that this can be credited (or offset) against the amount invoiced to LT, resulting in LT not having to pay anything at all.⁷ But this logic fails.

Let us assume that LT actually "sold" its services to the TTO, acting no differently than any other vendor. The "barter" LT suggests does not work mathematically. Why? Because the Treasurer actually spent \$1 million, with LT's share being \$250,000, meaning the share of all the other districts was \$750,000. But if LT does not actually pay its \$250,000, then the other districts have to come up the full \$1 million. This means they are paying more than their proportionate share. Somehow, the Treasurer has to receive \$1 million in cash, or there is a shortfall in funding, leading to a public deficit at the TTO.

⁷ Although the February 2000 Beckwith memorandum proposed that the Treasurer's office would pay for salaries and benefits for 3 positions totaling \$106,403, this grew significantly. By 2012, LT had increased its "proposal" to include full or partial salaries for 5 positions totaling \$297,991.10. (See June 13, 2012 memorandum, Exhibit 13; Dep. of D. Sellers, Exhibit 14, at 74:8-22.) But none of these subsequent "proposals" were ever shown to, or voted upon by, the Trustees. (Ex. 11 at ¶¶10-11.)

Thus, LT's "barter" theory does not work. It functionally excused LT from paying its proportionate share and left the other districts to pay the shortfall, increasing *their* combined proportionate share, in violation of Section 8-4 of the School Code.

5. If each party entered into the purported contract, and if the contract did not violate the School Code, it would have violated the Intergovernmental Cooperation Act and, thus, be unenforceable.

Another problem exists for LT's theory: if LT were truly a vendor, selling its services to the Treasurer's office, then the parties need an intergovernmental agreement. Historically in Illinois, local units of government were not permitted to contract with each other, as a result of *Dillon's Rule*. Article VII, Section 10 of the Illinois Constitution of 1970 abrogated *Dillon's Rule* by providing that local units of government may contract amongst themselves. *Connelly v. Clark County*, 16 Ill. App. 3d 947, 951 (4th Dist. 1973). In 1973, the Intergovernmental Cooperation Act was then enacted, 5 ILCS 220/1 *et seq.*

Section 3 of the Act provides that one public body may "exercise[], combine[], transfer[], and enjoy[]" its powers with another public body. 5 ILCS 220/3. Under LT's theory, this is what happened, *i.e.*, one public body (LT) performed work for another public body (the TTO). But Section 5 of the Act imposes certain requirements upon such contracts, and the purported contract at issue fails to comply with Section 5 of the Act in two (2) ways.

First, Section 5 provides intergovernmental agreements may exist, "provided that such contract shall be approved by the governing bodies of each party to the contract...." 5 ILCS 220/5. As argued above, the governing bodies of each party did not approve the purported contract. Moreover, because the purported contract actually resulted in the other districts paying more than their proportionate share, *they would have had to have been a party* to any agreement.

Certainly, the Treasurer does not need the permission of member districts to incur expenses, but this does not mean the Treasurer (or the TTO Board of Trustees) is thus authorized to require districts to pay more than their proportionate share. Any contract that functionally altered the statutory formula – although likely unenforceable in the first instance – would certainly need the informed consent of all the school districts and all of *their* Boards of Education would have to approve such contract.

Second, Section 5 provides that “[s]uch contract *shall set forth fully the purposes, powers, rights, objectives and responsibilities of the contracting parties.*” 5 ILCS 220/5 (emphasis added). The February 2000 Beckwith “proposal” does not contain this sort of detail. (See Ex. 6.) It does propose that certain tasks be performed by the Treasurer and that the Treasurer absorbs certain costs for the 1999-2000 fiscal year, but it does not state the purpose or objectives of the contract, nor the rights, powers or any other responsibilities of the parties.

Indeed, it does not even provide for the offset that LT claims. Rather, *it states that LT will send an invoice to the Treasurer, and the Treasurer will pay LT’s invoice.* (Ex. 6.) There is no evidence that LT ever sent an invoice to the Treasurer, or that such invoice was paid. While the effect of the parties exchanging annual invoices and checks is to produce a net amount, this is not what the parties actually did. Rather, they deviated from the “proposal,” and LT simply applied its own employees’ salaries as an offset. The memorandum does not permit this possibility.

The existence of a proper intergovernmental agreement is not mere formality. In *Village of Montgomery v. Aurora Township*, 387 Ill. App. 3d 353, 354 (2nd Dist. 2008), Montgomery brought suit seeking a declaratory judgment respecting which public body had the obligation to maintain a bridge. Aurora Township argued that either Montgomery or the City of Aurora had agreed to assume the obligation. The Appellate Court explained that:

[a]lthough the record contains intergovernmental agreements reflecting that during certain years, [the City of] Aurora agreed to plow and salt the bridge on behalf of the Township, neither Aurora nor Montgomery ever executed a formal agreement to take over maintenance responsibility for the bridge.

Id. at 358. Accordingly, lacking a proper intergovernmental agreement to transfer maintenance, the Township retained the obligation for maintenance of the bridge. *Id.*

Similarly, in *Connelly v. Clark County*, 16 Ill. App. 3d 947 (4th Dist. 1973), decided before the Intergovernmental Cooperation Act became law, the Appellate Court addressed whether Clark County was permitted to operate a gravel pit and sell gravel to other public bodies that needed to purchase gravel. The court concluded that although Clark County *could* have entered into an agreement with other public bodies, no such intergovernmental agreement existed. *Id.* at 951. Accordingly, while Clark County could operate the gravel pit for its own needs, it *could not sell excess gravel to other public bodies*, absent a formal intergovernmental agreement. *Id.* at 952.

In short, if one body politic is going to contract to perform work for another body politic, an actual intergovernmental agreement is necessary, and such agreements must, since 1973, comply with the Intergovernmental Cooperation Act. Thus, even if LT and the TTO agreed to the purported contract, and even if it did not violate the School Code, it violated the Illinois Intergovernmental Cooperation Act and is, thus, an unenforceable contract.

6. **Assuming the parties entered into the purported contract and assuming it violated neither the School Code nor the Intergovernmental Cooperation Act, it would have only applied to the 1999-2000 fiscal year.**

Assuming the Trustees and Board of Education did vote to enter into a contract, and assuming it complied with the School Code and Intergovernmental Cooperation Act, the contract was at most an agreement for the 1999-2000 fiscal year.

On its face, the February 2000 memorandum proposes that the Treasurer absorb the salaries of three (3) LT employees for "99-00." (Ex.6.) Nothing in the memorandum suggests it was to be applicable year-after-year on a going-forward basis. The face of the "contract" alone dictates this conclusion.

This conclusion is also supported, however, by Illinois cases holding that a public board cannot enter into contracts for employment or services lasting longer than the period for which the board making the decision has left to serve. *Cannizzo v. Berwyn Twp. 708 Cmty. Mental Health Bd.*, 318 Ill. App. 3d 478, 482-87 (1st Dist. 2000). Such contracts are "*ultra vires* and void *ab initio*." *Id.* at 487.

Here, the governing body of the TTO consists of 3 elected Trustees. 105 ILCS 5/5-2. One trustee is elected every 2 years to serve a 6-year term, with elections occurring in odd-numbered years. 105 ILCS 5/5-4; 5-13; 5-14. LT's theory is that the contract was agreed to by the TTO in March 2000 and by LT in June 2000. A new Board of Trustees would then be created in 2001, upon the next election. To the extent that LT argues the purported contract lasted longer than one (1) year, such longer contract would be *ultra vires* and void *ab initio*.

LT should not dispute this. When asked "Was it something that had to be approved every year by both parties?," LT's own Superintendent answered "As it involves expenditures, yes." (Ex. 5 at 55:2-4.) Despite this, there is no evidence the Trustees ever again discussed or voted upon the February 2000 "proposal" or any other similar "proposal" in ensuing years. (Ex. 11 at ¶11.)

Reinforcing that this was a one-year deal at the most is the expert opinion of Sylvetser that, in her expert opinion and as a matter of parliamentary procedure, nothing in the March 2000 Minutes or the June 2000 Minutes suggested an ongoing or reoccurring contract was being

discussed. (Ex. 11 at ¶11.) Sylvester's analysis of the Minutes reveals that when the Trustees *did* consider ongoing or reoccurring contracts, it was presented annually or biannually as appropriate. (Affidavit at ¶9.) The Trustees' custom was to review specific changes from previous contracts, including cost increases. (*Id.* at ¶¶9-10.)

Here, although Beckwith's February 2000 memorandum proposed a total of \$106,403 being charged to the Treasurer's office for 3 positions, by 2012 this cost had exploded to about \$297,991.10 for 5 positions. (Compare Ex. 6 to Ex. 13).⁸ But after the March 2000 meeting, none of the Minutes reflect the Trustees ever again discussed or voted upon the purported contract or its escalating costs. (Ex. 11 ¶11.)

For all of these reasons, the purported contract was (a) not entered into between the parties, (b) would have violated the School Code and/or Intergovernmental Cooperation Act, and/or (c) would have been limited to the 1999-2000 fiscal year at the most. The TTO is entitled to summary judgment in its favor on this issue and this Court should enter a declaratory judgment that the Treasurer may debit the amount of \$2,628,807, representing LT's proportionate share of the Treasurer's compensation and expenses that LT failed to pay, from the monies being held by the Treasurer and allocable to the defendant.

⁸ LT has asserted that each year it sent the equivalent of Beckwith's initial February 2000 proposal to Healy and that, each year, the TTO agreed to this proposal. LT cannot point to any board action by the Trustees, however, beyond its initial March 2000 discussion of that proposal. In its recent Second Amended Counterclaim, LT alleged that it "does not contest the TTO's right to terminate [the purported contract] in 2012 for 2013 fiscal year." (Ex. 21 at ¶13.) Thus, it may be that LT will argue the contract was intended to last indefinitely. This would violate Illinois law for the reasons described above. Moreover, through this allegation, LT concedes it is not relying upon its "contract" defense as its basis for not paying its full proportionate share for fiscal year 2013.

VI. CLAIM 3 – OVER-ALLOCATION OF INTEREST TO LT

A. Material Facts: LT Was Allocated More Interest On The Districts’ Pooled Investments Than Its Proportionate Share Of Distributions Actually Made.

1. The School Code’s Requirements.

Section 8-7 of the School Code: authorizes the Treasurer to pool the funds it collects and invest those funds for the benefit of the districts; requires the Treasurer to keep separate accounts for each district; and requires the Treasurer to allocate the investment income to the appropriate district. This allocation is done by a bookkeeping entry reflecting the allocation to each district. (Exs. 1 and 2 at ¶¶39-40; Dep. of R. Healy, Exhibit 15, at 66:5-14.)

Each district can only spend the money it has been allocated. Thus, if one district receives an over-allocation of, for example, investment income, then the other districts receive less money and have less money to spend on education. (Ex. 4 at 114:20-115:11.)

2. Healy’s Allocation of Investment Income.

During fiscal years 1995 through 2012, Healy collected the property taxes and other revenue each district received and accumulated that revenue within a general fiduciary fund. (Ex. 15 at 51:11-52:5.) Healy also maintained a general ledger for each district, and each district had various “funds” (e.g., for education, for transportation). The monies collected from each district (as accumulated in the general fiduciary fund) were, for accounting purposes, “placed” in these separate funds for each district. (Affidavit of J. Martin, Exhibit 16, ¶4a-e.)

Healy invested the money in the general fiduciary fund in bonds, CDs and other investments. These investments earned investment income,⁹ which was deposited back into the general fiduciary fund. Healy periodically allocated this investment income to the districts. (Ex. 15 at 51:11-53:23; Ex. 16 at ¶4a-e.)

⁹ The pooled investments generated interest, dividends and capitals gains; for convenience these are being referred to as “investment income”

To allocate the investment income to each district, Healy undertook the following steps. Each month, Healy received information (a report), which was generated by the TTO's general ledger computer system, of the separate "fund" balances for each district, which he would add together. (Dep. of K. Bradshaw, Exhibit 17, at 92:24-93:8.) Healy then added together each district's total fund balance to arrive at a "total fund balance" for all districts. He then calculated an average fund balance per quarter. The total fund balance for all districts became the denominator, and the total fund balance for each separate district became the numerator, in an equation to determine what percentage of the investment income earned would be allocated to the separate districts.¹⁰ (Ex. 15 at 52:1-54:19; Ex. 16 at ¶4 a-e.)

Healy estimated how much investment income could be allocated to the districts each quarter. (Dep. of M. Terpstra, Exhibit 18, at 43:15-44:3.) He did not allocate all of the investment income that was earned each quarter, and the amount of investment income to be distributed was generally a rounded number; *i.e.*, a reasonable, conservative estimate of the investment income available for distribution. Thus, some investment income was retained by the Treasurer.¹¹ (Ex. 15 at 52:7-59:22.)

¹⁰ Thus, for example, if the total fund balances for all districts for that quarter was \$100,000,000, and the total fund balance for LT for that quarter was \$25,000,000, Healy would determine that LT's share of the investment income for that quarter would be 25% (\$25,000,000 divided by \$100,000,000). Since LT had 25% of the total fund balance for that quarter, LT would receive 25% of the investment income that Healy allocated.

¹¹ Martin Terpstra, LT's expert, testified that the TTO's audited financial statements for the years 1995 through 2007 revealed that not all of the investment income was distributed each year by the Treasurer. (Ex. 18 at 30:24-34:13). Thus, Terpstra confirms Healy's testimony that not all investment income was distributed. Terpstra and LT argue that if the undistributed investment income was distributed, what LT owes would be reduced. (M. Terpstra Expert Report, Exhibit 19, at pp. 5-6.) That argument is without merit. As Terpstra testified, the undistributed investment income is available to be distributed, and LT would get its proportionate share when it is distributed. (Ex. 18 at 30:12-38:20.) Martin agreed. (Dep. of J. Martin, Exhibit 20, at 125:9-17.) However, the almost \$1.4 million over-allocated to LT would still be owed by LT; LT is trying to create an offset from future distributions that have not yet occurred.

After calculating the percentage of the total fund balance each district had, Healy then calculated, based upon that percentage, the amount of investment income that would be allocated to each district during that quarter.¹² (Ex. 15 at 52:16-59:15.) Healy prepared these calculations on handwritten paper ledger sheets each quarter during the relevant period, with all of the foregoing information set forth thereon. (The investment income identified on the sheets is the amount Healy would distribute, but it was not the actual amount earned – as mentioned, he distributed based upon a conservative estimate of what could be then-distributed.)

The handwritten sheets were accurate when prepared; they were prepared and retained in the ordinary course of the TTO's business; and Healy had personal knowledge of the information and calculations in the handwritten sheets. (Ex. 15 at 94:5-96:12; Ex. 20 at 66:12-16.) (Copies of those handwritten sheets are contained in two (2) redwelds marked as Bradshaw deposition exhibits 5 and 6; due to their voluminous nature they are not being attached.) (See Ex. 17 at 115:2-117:6.)

The amount Healy calculated each quarter to be allocated to a district should have been distributed to that district. The method of distribution was for the Treasurer's office to make a bookkeeping entry in the general ledger for each district, showing the amount of investment income Healy calculated was allocated to each district via transfer from the TTO's general fiduciary fund. There was no payment of cash or payment by check to each district; rather, the distribution was accomplished through journal entries. (Ex. 15 at 65:19-66:14.)

Thus, for example, if one would add up the sums Healy calculated on his handwritten sheets to be allocated to LT each quarter, those exact sums should appear in TTO's general ledger for LT each quarter during the relevant period. For reasons not germane to this argument,

¹² For example, if Healy determined that \$1,000,000 of investment income would be distributed during a particular quarter, and if LT's percentage of the total fund balance was 20% at that time, LT should receive an allocation of \$200,000 of the investment income to be distributed that quarter.

at various times, the amounts set forth on Healy's notes that *should have been* allocated to LT were not the amounts actually allocated and recorded on the general ledger. During some years, LT was over-allocated investment income as calculated by Healy, and in other years, LT was under-allocated investment income. (Ex. 16 at ¶4e; Ex. 17 at 90:19-92:18; 103:2-12 and 110:21-114:3; Exhibit 3 to Bradshaw deposition, attached as Exhibit 16(b).) The total amount of investment income that should have been allocated to LT (as reflected on Healy's notes), versus the amount actually allocated to LT (as reflected on the actual general ledger), reveals that LT was over-allocated at least \$1,386,267.03.¹³

3. Reviewing the TTO's records after Healy's resignation.

After August 2012, Healy was no longer employed by the TTO. Bradshaw reviewed both Healy's handwritten sheets calculating the investment income to be distributed to each district and the general ledger for LT. The purpose of this review was to determine whether LT had been over-allocated investment income. (Ex. 17 at 62:6-64:21; 85:14-95:7) Exhibit 16(B) is Bradshaw's work product; a report entitled "Interest Allocation 2.xls (produced 2/19/2016)." The first page is a summary, on a year-by-year basis for the relevant period, showing that in some years LT was under-allocated investment income and in other years LT was over-allocated investment income. According to Bradshaw, LT was over-allocated investment income in the amount of \$1,574,636.77. (Ex. 17 at 90:15-91:1; Ex. 16(B) hereto.)

¹³ TTO calculated the over-allocation as \$1,574,636.77, the sum sought in the Amended Complaint. TTO retained an expert, James Martin, a CPA, who opined that the over-allocation was less: \$1,427,442.04. (Ex. 16 at ¶6.) LT then retained an expert witness, Martin Terpstra, also a CPA, who opined that Martin's calculation was still overstated and Martin's methodology should have produced a total over-allocation of \$1,386,267.03. (Ex. 19 at pp. 9-10.) Without waiving its full damage claim for the over-allocation of investment income in the event this matter goes to trial, TTO will accept Terpstra's calculation of the over-allocation as \$1,386,267.03 for purposes of this Motion.

Martin, the TTO's expert, reviewed the same materials that Bradshaw reviewed and provided an opinion that during the relevant period, LT was over-allocated \$1,427,442.04 of investment income. (Ex. 20 at 63:5-13; Ex. 16 at ¶6.) Martin also examined allocations to the other districts and found that other districts were not getting additional investment income at times when LT did. (Ex. 20 at 72:12-76:5.) Martin determined that when LT got misallocated investment income in a quarter, the other districts got the percentage and amount detailed on Healy's sheets. (Ex. 20 at 154:4-155:7.) Martin took Bradshaw's report and made certain adjustments to it. Martin's adjustments are reflected on the attached Exhibit 16(C), which is Exhibit 7 to his deposition, entitled "District 204, Interest Allocation Analysis, Summary of Differences by Fiscal Year." (Ex. 16, ¶¶5-6.)

Martin found a few differences as compared to Bradshaw's initial work. (Ex. 20 at 101:6-103:10.) Martin determined that: (1) the entry on Bradshaw's report for 6-30-06 should be \$569,952, (2) the entry for 1-31-05 should be \$207,601, and (3) the entry for 6-30-04 should be \$147,979. Because of the foregoing three changes, the summaries for FY 2005 and FY 2006 changed, and the entry for FY 2005 was \$127,611.74 (rather than \$143,364.326 as Bradshaw indicated on her work product, Exhibit 16(B) hereto) and the entry for FY 2006 became \$420,744 (rather than Bradshaw's entry of \$391,350.27). As a result of these adjustments, the "difference" between Healy's calculations and the general ledger entries for LT's share of investment income reveal that LT was actually over-allocated \$1,427,442.04. (See Exhibit 16 at ¶6; Exhibit 16(C); Ex. 20 at 63:5-65:17.)

Martin's opinion that there was an over allocation of \$1,427,442.04 of investment income to LT is based upon several assumptions respecting Healy's handwritten notes. First, that Healy's determination of the total fund balance for the general fiduciary fund and the total fund

balance for each district on his handwritten pages was accurate. Second, that Healy's percentage of investment income to be allocated to each district was accurate, *i.e.*, Healy accurately determined the numerator and denominator of the equation. Third, that the amount of investment income identified to be distributed each quarter on the handwritten pages was available to be distributed.¹⁴ (Ex. 20 at 30:11-33:20; 66:12-16, 69:14-24; Ex. 18 at 47:21-49:15.) Martin's opinion confirms that Healy's calculations on his handwritten sheets were accurate.

¹⁴ During the course of this litigation, LT has argued that the total amount of investment income earned by the Treasurer cannot be determined because TTO's records are incomplete. Both Martin and Terpstra agree with that statement. However, the fact that the total amount of investment income earned cannot be calculated is a red herring. It is undisputed that: investment income was earned; deposited into the general fiduciary fund; distributed to all of the districts; and all of the districts used that investment income. There was never a time where a district ran out of money because the investment income was not available. Terpstra does not dispute that the investment income Healy determined was available for distribution was, in fact, available, and there is no contrary evidence on this issue. The point is that when Healy distributed/allocated income, he gave LT more than its share of the distribution being made.

B. Legal Argument: LT's Was Unlawfully Over-Allocated Investment Income.

1. LT was over-allocated investment income.

The TTO's position, that LT was over-allocated investment income during the relevant period, is accurate. Terpstra reviewed the documentation in this case, including Martin's determination as to the over-allocation of investment income to LT. Several facts are important to note from Terpstra's opinions, which are set forth in both his Expert Report (Exhibit 19) and in his deposition. With respect to the methodology that Martin used to determine whether Healy over-allocated investment income to LT, Terpstra: (a) *does not* disagree with the quarterly determinations by Healy of the total general fiduciary fund balance for all districts; (b) *does not* disagree with Healy's quarterly determination of the fund balances for each district; and (c) *does not* disagree that Healy accurately calculated the percentage of investment income that each district was to receive based upon the formula whereby each district's fund balance was the numerator and the total fund balance in the general fiduciary fund was the denominator. (Terpstra's Expert Report and his deposition testimony do not dispute these statements.) Moreover, Terpstra testified that Martin relied on Healy's handwritten notes and calculations to determine the amount to be distributed to LT. (Ex. 18 at 47:14-49:15.)

Terpstra also does not dispute that almost all of Martin's analysis was accurate with respect to the amounts in fact allocated to LT as set forth in the general ledger. The only minor disagreement is set forth on pages 9-10 of Terpstra's Expert Report. Terpstra believes that Martin should have made the following three adjustments: (1) the April 30, 1995 alleged over-allocation of \$5,000.33 was, essentially, eliminated because there is another general ledger entry that shows there was an interest transfer of \$5,000 on April 30, 1995 to LT; (2) the April 30, 1998 alleged over-allocation to LT of investment interest in the amount of \$4,674.68 was

eliminated by the general ledger entry on March 31, 1998, for \$4,675, described as “quarterly interest;” and (3) Martin included an additional \$31,500 of investment income to LT from a June 20, 2006 entry in the general ledger when the description for the entry was not consistent with the words “quarterly interest” that were used to describe all other investment income allocations to LT. (See Ex. 19 at pp. 9-10.) Terpstra opines that Martin should not have ignored these three entries, which would have effectively reduced the amount of the over-allocation of investment income to LT.

Taking all of Terpstra’s foregoing opinions into consideration, and accepting them for purposes of this Motion, Martin’s determination as to the over-allocation of investment income should be reduced by \$41,175.01 (\$5,000.33 plus \$4,674.68 plus \$31,500.00). The TTO is willing to accept this reduction in the amount of over allocation of investment income to LT.¹⁵

2. Terpstra’s other opinions do not defeat the TTO’s position.

Terpstra also opines that certain of the entries on Healy’s handwritten sheets are inaccurate. (Expert Report, Ex. 19 at pp. 8-9.) However, in reality, there are only a few alleged inaccuracies pointed out by Terpstra over an 18-year period of time. These inaccuracies are both red herrings and of no assistance to LT. On those entries where Healy’s math was incorrect as to the amount of investment income to be allocated to a district, the general ledger for the district has the correct amount.¹⁶ Furthermore, almost all of the inaccuracies noted by Terpstra do not

¹⁵ In his Expert Report, Terpstra states that there was an under-allocation of investment interest in the amount of \$101,829.90 at December 31, 1997, but the TTO’s auditor proposed an adjustment as to that exact sum, as reflected on Healy’s handwritten sheet. Martin, however, ignored the auditor’s adjustment. (Ex. 19 at p. 9.) If Terpstra is correct and the allocation to LT on December 31, 1997, was proper, and thus there was no under-allocation of investment income to LT, this would *increase* LT’s overall over-allocation by \$101,829.90. The TTO will, however, be guided by Marten’s opinion and not increase its damage claim by this amount for purposes of this Motion.

¹⁶ For example, in his fifth and seventh bullet-points on page 8 of Exhibit 19, Tepstra states: (a) “In his June 2006 calculation, Healy apparently over-allocated \$128,819 to LT. While his math on the

relate to LT (*i.e.*, District 204), and those that relate to LT reflect an over-allocation of investment income to it – as the TTO contends.¹⁷ Thus, while there may have been a few instances over 18 years where Healy's handwritten sheets are not perfect, when Healy sets forth a sum that is to be allocated to a district other than LT, that sum, as pointed out by Terpstra, was correctly recorded in the general ledger for that district. Thus, contrary to Terpstra's assertion, Healy's handwritten sheets are reliable.

As Martin and Healy testified, those handwritten sheets are the business records of the TTO. (Ex. 15 at 94:5-96:11; Ex. 20 at 66:12-16.) Neither Terpstra nor any other witness on behalf of TTO disagreed. Furthermore, while Terpstra opines that there are over-allocations of interest by Healy to other districts (see Ex. 19 at pp. 10-11), this merely lends an air of authority for the TTO to pursue claims against those districts, too; it does not excuse the over-allocation to LT. Other than a difference of opinion between Terpstra and Martin as to the precise amount of over allocation, which is a difference of about 3% (\$1,427,442.04 versus \$1,386,267.03), both experts agree that using Healy's handwritten sheets as to the amount of investment income to be allocated to LT, and comparing the amount actually allocated to LT as reflected on its general ledger, there was an over allocation to LT of more than \$1.3 million dollars.

Accordingly, the TTO is entitled to summary judgment on this claim, and this Court should enter a declaratory judgment that the Treasurer may debit the amount of \$1,386,267.03, representing the over allocation of investment income to LT, from the monies being held by the Treasurer and allocable to LT.

handwritten sheet does not appear to be accurate for several Districts, the amount written on the sheet for LT agrees to the amount recorded in the TTO's general ledger;" and (b) "In his April 2008 calculation, Healy apparently over-allocated \$27,863 to LT; however, the amount on Healy's handwritten sheet (\$292,000) for LT's quarterly distribution agrees to the amount recorded in the TTO's general ledger."

¹⁷ Terpstra's second, fifth, seventh, ninth and eleventh bullet-points on pages 8 and 9 of Ex. 19 refer to LT (District 204), and they all show that Healy benefitted, or seemingly tried to benefit, LT.

VII. THE TTO IS ALSO ENTITLED TO SUMMARY JUDGMENT ON LT'S AFFIRMATIVE DEFENSES

The TTO is also entitled to summary judgment on LT's nine (9) affirmative defenses. A copy of LT's Amended Affirmative Defenses is attached as Exhibit 21.

A. First Affirmative Defense: Laches.

"There is considerable reluctance to impose the doctrine of *laches* to actions of public entities unless unusual or extraordinary circumstances are shown." *Van Milligan v. Board of Fire & Police Comm'rs*, 158 Ill. 2d 85, 90 (1994). This is because "*laches* may impair the functioning of the [public body] in the discharge of its government functions, and valuable public interests may be jeopardized or lost by negligence, mistakes, or inattention of public officials. *Id.*; accord *Wabash County v. IMRF*, 408 Ill. App. 3d 924, 936 (2d Dist. 2011) ("the doctrine should not be imposed on a government entity absent extraordinary circumstances, because the public would be adversely affected.").

Although the decision to apply *laches* is discretionary, nonaction of government officials is not sufficient to support a *laches* defense. *City of Chicago v. Alessia*, 348 Ill. App. 3d 218, 229 (1st Dist. 2004) Rather, an affirmative act is required, which must induce the action of the defendant, under circumstances making it inequitable to permit the public body to retract what its officers had done. *Id.* The resultant delay must also cause particularized prejudice, "[a] defendant's suggestion that he might have asserted his rights differently or have entered into some kind of settlement had the plaintiff promptly asserted its rights is only speculative and does not support the validity of a *laches* defense. *Id.*

These facts are why the doctrine is not a defense to LT. Healy's failures directly caused LT to gain unlawful financial benefits in violation of the School Code. Whether Healys' failures result from negligence, mistake or inattention, the inequitable result would be to permit LT to get

its unlawful financial benefits to the detriment of the other districts. Moreover, LT has asserted only generalized prejudice, alleging that it relied on the purported contract in formulating its budget and managing funds. (Ex. 21 at ¶55.) But even if the TTO had brought this lawsuit within a few years, LT still would have passed its annual budgets and managed its funds on an annual basis. The “prejudice” of which LT complains is really little more than an argument that it does not want to “give back” the unlawful benefits. The TTO is entitled to summary judgment on the first affirmative defense.

B. Second Affirmative Defense: Statute of Limitations.

For the reasons set forth in responding to LT’s motion for partial summary judgment on this issue, no limitations period applies to this case and the TTO is entitled to summary judgment on the second affirmative defense.

C. Third and Fourth Affirmative Defenses: Promissory Estoppel and Equitable Estoppel.

LT alleges promissory estoppel as its third affirmative defense and equitable estoppel as its fourth affirmative defense. LT does so only with respect to the first 2 claims; LT does not assert these doctrines as a defense as to the TTO’s over-allocation of interest claim. Although the doctrines are somewhat different, “similar considerations apply when these doctrines are asserted against public bodies.” *Matthews v. CTA*, 2016 IL 117638, ¶94. Illinois courts have consistently held that these doctrines “will not be applied to governmental entities absent extraordinary and compelling circumstances.” *Id.*

1. Promissory Estoppel.

With respect to promissory estoppel, it is an offensive doctrine. It is intended to permit a claim to succeed, under certain circumstances, “where the other elements of a contract exist (offer, acceptance, and mutual assent), but consideration is lacking.” *Id.* at ¶93. It is distinguished

from equitable estoppel in that promissory estoppel “allows a party to pursue a claim for damages” whereas “the latter is used as a defense....” *Id.* at ¶94, n.11. Accordingly, promissory estoppel is not appropriately asserted as an affirmative defense, and for this reason alone the TTO is entitled to summary judgment on LT’s third affirmative defense.

Even if that this Court held otherwise, however, promissory estoppel creates a contract implied in fact. *Id.* at ¶93. A public body cannot be held liable under a contract implied in fact if such contract is *ultra vires*, contrary to statutes, or contrary to public policy. *Id.* at ¶98. For example, in *Matthews*, CTA employees sought to hold the CTA liable for certain promises one of its agents made. The Supreme Court explained that the CTA “can only be contractually bound by official action taken by the Chicago Transit Board.” *Id.* at ¶99. “Consequently, a CTA employee cannot act in such a manner as to form a contract without the approval of the Chicago Transit Board.” *Id.* at ¶98. On this basis, the Supreme Court rejected the application of promissory estoppel. *Id.* at ¶94.

For all of the reasons discussed in Part V of this Motion, the purported contract excusing LT from paying its proportionate share of the Treasurer’s expenses is not enforceable. LT does not allege any such contract excused it from paying for its own audit expenses, and LT certainly does not point to any action on the part of the Trustees themselves to approve such a contract. Accordingly, the doctrine of promissory estoppel is not applicable to that claim, either.

2. Equitable Estoppel.

With respect to equitable estoppel, the analysis is much the same. Equitable estoppel may not be applied against a public body unless the body itself takes official action, or there is action by an official with express authority to bind the body. *Patrick Eng’g, Inc. v. City of Naperville*, 2012 IL 113148 (2012), ¶39. A public body cannot be estopped “by an act of its agent beyond

the authority expressly conferred upon that official.” *Id.* at ¶39. Unauthorized acts by a public official do not bind a public body because otherwise the body “would remain helpless to correct errors.” *Id.* at ¶36. To establish equitable estoppel LT must establish (i) an affirmative act by the TTO itself or by an agent within the scope of his express authority, and (ii) LT detrimentally changing its position in reasonable reliance upon such act. *Id.* at ¶40. Moreover, “when public revenues are at stake, estoppel is particularly disfavored.” *Id.*

Here, beyond the single March 2000 Township Trustees board meeting, LT cannot point to conduct by the Trustees that might the basis of an equitable estoppel claim. LT may argue that Healy represented the TTO had authorized Healy’s own wrongdoings, but such misrepresentations cannot form the basis of an equitable estoppel claim against a public body.

Moreover, LT cannot point to a detrimental change made in reasonable reliance upon such claims. With respect to the first claim, wherein the TTO purportedly agreed to pay the salaries of three (3) LT employees, those employee “were in place for many years” before the purported contract was even discussed. (Ex. 5 at 93:3-7.) With respect to the TTO’s payment of the audit fees, while LT may argue it would have engaged a different accountant had it been forced to pay for its own firm, this is just speculation. LT’s Director of Business Services for the period 2003 through 2014 testified that Baker Tilly provided satisfactory services. (Ex. 14 at 32:8-13)

Finally, the purpose of equitable estoppel is to “to prevent fraud or injustice.” *Gorgees v. Daley*, 256 Ill. App. 3d 143, 146 (1st Dist. 1993). Requiring LT to adhere to its statutory obligations to pay for its own annual audits and to pay its proportionate share of the Treasurer’s office could not possibly serve as a fraud or injustice. Indeed, absent LT paying for itself, the other districts will have to absorb LT’s share of those costs – *that* result would be an injustice.

D. Fifth Affirmative Defense: Waiver.

In its fifth affirmative defense, LT alleges that the TTO waived its right to now require LT to pay its proportionate share because the TTO did not assert that right during the period at issue. As an initial matter, as argued in the TTO's response to LT's motion for partial summary judgment, the statute of limitations does not operate to bar a public entity from bringing suit where it is asserting a public right. Given this rule of law, it is difficult to understand why the doctrine of waiver would be applicable under the same fact pattern.

Regardless, the facts do not support waiver. Waiver "arises from an affirmative act, is consensual, and consists of an intentional relinquishment of a known right." *People v. Houston*, 229 Ill. 2d 1, 10 n.3 (2008). The mere delay in asserting a claim against LT cannot, therefore, serve as a waiver. Further, as LT does not allege the existence of an express waiver, it has the burden of proving implied waiver by "a clear, unequivocal and decisive act of its opponent manifesting an intention to waive rights." *Ciers v. OL Schmidt Barge Lines, Inc.*, 285 Ill. App. 3d 1046, 1050 (1st Dist. 1996). All LT has alleged is that the TTO failed to enforce its rights by forcing LT to pay its proportionate share of the Treasurer's expenses. This is not an affirmative act and is also not a "clear, unequivocal and decisive act" that establishes waiver.

Finally, the affirmative act must be the act of the Trustees themselves as the governing body of the TTO; Healy cannot waive the rights of the TTO. *See Schivarelli v. CTA*, 335 Ill. App. 3d 93, 102 (1st Dist. 2005) (holding that the failure of the CTA to seek payment of utility costs from its tenant, even though it accepted rent during the 14-year period at issue, did not waive the CTA's rights to seek such payment because there was no evidence the CTA Board itself waived the right). LT has not alleged that the Trustees themselves undertook such a clear,

unequivocal, decisive and affirmative action that would support the allegation of waiver. The TTO is entitled to summary judgment in its favor on this defense.

E. Sixth Affirmative Defense: Unclean Hands.

LT alleges unclean hands as its sixth affirmative defense. This doctrine is “not favored by the courts....” *Carlyle v. Jaskiewicz*, 124 Ill. App. 3d 487, 498 (1st Dist. 1984). Its purpose “is to protect courts of equity in keeping with the policy that equity should not aid a wrongdoer; [its purpose] is not to protect the party asserting it as a defense.” *Id.*; *see also Cole v. Guy*, 183 Ill. App. 3d 768, 776 (1st Dist. 1989) (“purpose of the ‘unclean hands’ doctrine is to protect courts of equity from assisting litigants in accomplishing their fraudulent or unlawful purposes, and not to protect the party raising the doctrine as a defense.” Its application lies within this Court’s sound discretion. *Id.*

LT alleges the “bad conduct” of the TTO began in 2013, when it (a) denied the existence of the purported contract excusing LT from paying its proportionate share of the Treasurer’s expenses, (b) argued that any such contract would have required an intergovernmental agreement, (c) asserted its claim that LT was over-allocated of investment income despite the “absence of sufficient records,” and (d) sought to recoup the audit payments. (Ex. 21 at ¶92.) The TTO’s assertion of its present claims in 2013 cannot be fairly characterized as either “fraudulent or unlawful” in purpose. To the contrary, the TTO is seeking to enforce the School Code. Even if LT disagrees with the validity of these claims, the TTO is not acting with unclean hands.

F. Seventh and Eighth Affirmative Defenses: Unjust Enrichment and *Quantum Meruit*.

LT alleges unjust enrichment for its seventh affirmative defense and *quantum meruit* for its eighth affirmative defense. Through each, LT alleges that the parties agreed that LT could offset the salaries of its own personnel against LT’s proportionate share of the Treasurer’s

expenses of office. These are not affirmative defenses, however, they are affirmative actions seeking recovery. *Partipilo v. Hoffman*, 156 Ill. App. 3d 806, 809-10 (1st Dist. 1987); *Storino, Ramello & Durkin v. Rackow*, 2015 IL App (1st) 142961, ¶36. Accordingly, the TTO is entitled to summary judgment in its favor on these affirmative defenses.

G. Ninth Affirmative Defense: Voluntary Payment Doctrine.

The voluntary payment doctrine provides that, absent fraud, duress or mistake of fact, money paid on a claim of right to the payment cannot be recovered on the ground that the claim was illegal. *Ramirez v. Smart Corp.*, 371 Ill. App. 3d 797, 801 (3rd Dist. 2007). The TTO is entitled to summary judgment in its favor on this affirmative defense for a variety of reasons. First, no Illinois court has applied the voluntary payment doctrine against a public body. Other jurisdictions have held that the doctrine does not apply where the recovery of public funds are at issue. *See, e.g., Kansas City v. Halvorson*, 177 S.W.2d 495, 498 (Mo. 1943); *Township of Normania v. Yellow Medicine County*, 286 N.W. 881, 883 (Minn. 1939); *State ex rel. Hunt v. Fronizer*, 1906 WL 1164 (Ohio C.C. May 19, 1906); *Wiles v. McIntosh County*, 88 N.W. 710, 712-13 (N.D. 1901); *Village of Ft. Edwards v. Fish*, 50 N.E. 973 (N.Y. 1898).

This is logical because, as demonstrated above, special rules govern lawsuits involving public funds. The voluntary payment doctrine is little more than another form of estoppel, and the Illinois Supreme Court has explained that estoppel “will not be applied to governmental entities absent extraordinary and compelling circumstances.” *Matthews*, 2016 IL 117638 at ¶94. Further, estoppel may not be applied against a public body through the unauthorized acts of a public official. *Patrick Eng’g*, 2012 IL 113148 at ¶39. There is no reason for this doctrine to apply to this lawsuit. This is particularly so where the TTO is acting as a trustee, seeking to recover monies on behalf of other school districts.

Even if this Court were to apply the doctrine, however, such application would fail under the facts presented. First, the TTO has not “paid” sums to LT under a “claim of right” to the payment. The record shows that: any investment income allocated to LT was done through a bookkeeping entry, not actual payment of cash;¹⁸ while the TTO paid for LT’s annual audit, but this money was not paid to LT and Baker Tilly is not asserting the defense; and while Beckwith’s February 2000 memorandum proposed that the TTO would actually “pay” LT the sums set forth therein, such payment was never actually made. In short, the TTO has never “paid” any of the amounts at issue to LT.

If this Court is to hold that the doctrine may be applied against a public body under the facts presented here, and that the doctrine applies despite that the TTO never paid sums to LT under a claim of right, then the TTO reserves its right to present evidence at trial that such sums were paid as a result of fraud, duress or mistake of fact.

¹⁸ Further, with respect to the allocation of interest, the allocations were not made under a “claim of right” by LT. That is to say that LT never claimed the right to the specific interest allocated.

VIII. CONCLUSION

WHEREFORE, for the reasons stated herein, Township Trustees of Schools Township 38 North, Range 12 East, respectfully requests that this Court grant this Motion for Summary Judgment and:

a. enter a declaratory judgment that the Treasurer may debit \$511,068.60, representing the defendant's audit costs, from the monies being held by the Treasurer and allocable to the defendant;

b. enter a declaratory judgment that the Treasurer may debit the amount of \$2,628,807, representing the amount of its proportionate share of the Treasurer's compensation and expenses that the defendant has failed to pay, from the monies being held by the Treasurer and allocable to the defendant;

c. enter a declaratory judgment that the Treasurer may debit the amount of \$1,386,267.03, representing the over-allocation of investment income to the defendant, from the monies being held by the Treasurer and allocable to the defendant; and

d. providing such further relief as may be equitable.

The Plaintiff will provide a form declaratory judgment for entry upon this Court's ruling on this Motion for Summary Judgment.

Respectfully submitted,

TOWNSHIP TRUSTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12 EAST

By: 

One of its attorneys.

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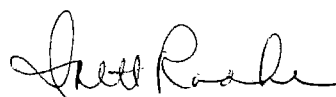
PROOF OF SERVICE

The undersigned, a non-attorney, certifies that a copy of the following document, **Plaintiff's Motion for Summary Judgment**, has been served upon:

Jay R. Hoffman
Hoffman Legal
20 N. Clark Street, Suite 2500
Chicago, IL 60602
jay@hoffmanlegal.com

as follows:

X	by personal service on July 17, 2017 before 5:00 p.m.
	by U.S. mail, by placing the same in an envelope addressed to them at the above address with proper postage prepaid and depositing the same in the U.S. Postal Service collection box at 225 W. Washington Street, Chicago, Illinois, on July 17, 2017 before 5:00 p.m.
	by facsimile transmission from 225 W. Washington Street, Suite 2600, Chicago, Illinois to the [above stated fax number/their respective fax numbers] from my facsimile number (312) 460-4201, consisting of ____ pages on July 17, 2017 before 5:00 p.m., the served [party/parties] having consented to such service.
	by Federal Express or other similar commercial carrier by depositing the same in the carrier's pick-up box or drop off with the carrier's designated contractor on July 17, 2017 before the pickup/drop-off deadline for next-day delivery, enclosed in a package, plainly addressed to the above identified individual[s] at [his/her/their] above-stated address[es], with the delivery charge fully prepaid.
	by electronic mail, on July 17, 2017 before 5:00 p.m., the served [party/parties] having consented to such service.



[X] Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct

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PLAINTIFF'S APPENDIX OF EXHIBITS

Appendix of Exhibits

Ex. 1	TTO Amended Complaint
Ex. 2	LT Answer to Amended Complaint
Ex. 3	Affidavit of S. Birkenmaier (separate binder)
Ex. 4	Deposition of M. Thiessen
Ex. 5	Deposition of T. Kilrea
Ex. 6	February 2000 Memorandum
Ex. 7	Deposition of E. Grimes
Ex. 8	March 2000 TTO Board Packet (portions)
Ex. 9	June 2000 LT Board of Education Packet (portions)
Ex. 10	Deposition of L. Beckwith
Ex. 11	Affidavit of N. Sylvester
Ex. 12	Deposition of N. Sylvester
Ex. 13	June 2012 Memorandum
Ex. 14	Deposition of D. Sellers
Ex. 15	Deposition of R. Healy
Ex. 16	Affidavit of J. Martin
Ex. 17	Deposition of K. Bradshaw
Ex. 18	Deposition of M. Terpstra
Ex. 19	Expert Report of M. Terpstra
Ex. 20	Deposition of J. Martin
Ex. 21	LT's Amended Affirmative Defenses

EXHIBIT 1

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)
TOWNSHIP 38 NORTH, RANGE 12)
EAST,)

Plaintiff,)

vs.)

LYONS TOWNSHIP HIGH SCHOOL)
DISTRICT NO. 204,)

Defendant.)

No. 13 CH 23386

Hon. Sophia H. Hall
Calendar 14

VERIFIED AMENDED COMPLAINT FOR DECLARATORY RELIEF

Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East, by its undersigned counsel, KUBASIAK, FYLSTRA, THORPE & ROTUNNO, P.C., for its Verified Amended Complaint for Declaratory Relief against the defendant, Lyons Township High School District No. 204, states as follows:

THE PARTIES, JURISDICTION AND VENUE

1. Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East ("Township Trustees"), is a corporate entity organized under the laws of the State of Illinois with its principal office in LaGrange Park, Cook County, Illinois.

2. Defendant, Lyons Township High School District No. 204 ("District 204"), is a corporate entity organized under the laws of the State of Illinois with its principal office in LaGrange, Cook County, Illinois.

3. District 204 is subject to the personal jurisdiction of this Court because it is an entity organized under the laws of the State of Illinois.

EXHIBIT

1

4. Venue is proper in Cook County because District 204 has its principal office in Cook County and because the transactions, or some part thereof, out of which the cause of action alleged herein arose occurred in Cook County.

THE ROLE OF THE TOWNSHIP TRUSTEES AND TREASURER

5. Pursuant to the Illinois School Code, 105 ILCS 5/1 *et seq.* (the "School Code"), and more particularly Section 8-1 thereof, the Township Trustees, who are elected by and responsible to the voters within Lyons Township, have appointed the Lyons Township School Treasurer (the "Treasurer") to serve as the statutorily-appointed treasurer for the school and other educational districts within Lyons Township for which the Township Trustees are responsible.

6. These school and other educational districts for which the Township Trustees are responsible, and for which the Treasurer provides financial services, include District 204 and: Western Springs School District 101; LaGrange School District 102; Lyons School District 103; Cook County School District 104; LaGrange School District 105; Highlands School District 106; Pleasantdale School District 107; Willow Springs School District 108; Indian Springs School District 109; Argo Community High School District 217; LaGrange Area Department of Special Education, which serves students from fifteen area school districts; Intermediate Service Center #2, which serves forty school districts in western Cook County; Lyons Township Elementary School District Employee Benefits Cooperative; and the Lyons Township Elementary School District Employee Benefits Cooperative.

7. The above school districts contain thirty-eight schools servicing almost 20,000 students.

8. The districts within Lyons Township comprise a Class II county school unit within the meaning of the School Code.

9. The duties of the Township Trustees and the Treasurer are set out in Articles 5 and 8 of the School Code, respectively.

10. As alleged more specifically herein, the obligation of the Treasurer is, in pertinent part, to take custody of public funds for the benefit of the districts it serves (with such funds coming from property taxes and other sources), invest those funds for the benefit of these districts, and pay such amounts to those persons and entities as it is lawfully instructed to pay by the districts it serves, whether such payments are for payroll or other purposes.

11. The obligation of the Treasurer to serve the financial needs of these districts, including managing the public funds upon which they depend and paying their bills, enables the districts to fulfill one of the most important public obligations of government: the obligation to educate. It is the public policy of the State of Illinois, as expressed through Article X, Section I of its Constitution, that "[a] fundamental goal of the People of the State is the educational development of all persons to the limits of their capabilities."

12. Pursuant to Section 8-17 of the School Code, the Treasurer is to receive public funds, including property taxes, and hold those funds for the benefit of the school and other educational districts it serves in furtherance of their obligation to provide for the education of students within Lyons Township.

13. Pursuant to Section 8-7 of the School Code, the Treasurer is, "the only lawful custodian of all school funds."

14. Section 8-6 of the School Code requires that the Treasurer "have custody of the school funds and shall keep in a cash book separate balances."

15. In accordance with Section 8-6, the Treasurer is required to maintain cash balances, by fund, for each district which it serves and the Treasurer is obligated to reconcile such balances with the respective cash balances shown by each district.

16. Section 8-17 of the School Code also imposes upon the Treasurer the responsibility for all receipts, disbursements, and investments arising out of the operation of all the school districts being served by the Treasurer.

17. With respect to paying such amounts as each district may owe, Section 8-16 of the School Code requires that the Treasurer make payment on behalf of the districts it serves out of the funds allocated to such districts, but "only upon an order of the school board signed by the president and clerk or secretary or by a majority of the board"

18. Sections 10-18 and 10-20.19 of the School Code provide further detail as to the procedure to be followed in submitting the above orders for payment. The form of order is specifically provided for in Section 10-18.

19. Section 10-20.19 also allows a board to choose to substitute a certified copy of the portions of the board minutes, properly signed by the secretary and president, or a majority of the board, showing all bills approved for payment by the board and clearly showing to whom, and for what purpose each payment is to be made by the Treasurer, and to what budgetary item each payment shall be debited. That certified copy provides "full authority" to the Treasurer to make the payments. A voucher system may also be used so long as it provides the same information.

20. In order to make payments as lawfully instructed by the districts which it serves, the Treasurer utilizes what are called "Agency Accounts" at local banks.

21. When a district has provided lawful instruction to the Treasurer to issue payment, the Treasurer effectuates the payment drawing on the appropriate Agency Account.

22. Agency Accounts are funded by transfer from other accounts in the custody of the Treasurer and maintained and utilized by the Treasurer to hold funds belonging to multiple districts and for which there is not an immediate need. The funds in the Agency Account, both before and after they arrive in the Agency Account, remain in the custody of the Treasurer.

23. The districts do not have signatory power on the Agency Accounts, with the exception of certain revolving and flex-spending accounts not at issue in this litigation. The Treasurer has signatory power on the Agency Accounts.

**DISTRICT 204'S FAILURE TO PAY FOR ITS *PRO RATA* SHARE OF THE
TREASURER'S OPERATIONAL EXPENSES**

24. The Treasurer has its own costs to run its office and provide its financial services to the districts it serves, including the Treasurer's compensation and expenses of the Treasurer's office. The Treasurer pays these operating expenses from its General Fund, which is funded through each district's Agency Account as alleged more fully below.

25. Section 8-4 of the School Code requires that each district "shall pay a proportionate share of the compensation of the township treasurer serving such district or districts and a proportionate share of the expenses of the treasurer's office."

26. Pursuant to Section 8-4 of the School Code, each district's *pro rata* share "shall be determined by dividing the total amount of all school funds handled by the township treasurer by such amount of the funds as belong to each such . . . district."

27. This statutory formula obligates the districts with the most money to pay the largest proportion of the costs. For example, if a district is allocated twenty-five percent of all public funds handled by the Treasurer, then it is required by the School Code to pay twenty-five percent of the Treasurer's operating expenses.

28. This statutory formula is mandatory and can only be changed by the General Assembly. No district may unilaterally decide it does not wish to pay its *pro rata* share, nor may any private agreements be made between public bodies in violation of the School Code. A district is required to pay the amount calculated and has no statutory authority to deduct any of its own expenses from its *pro rata* share it owes.

29. In accordance with the statutory requirements of the School Code, on an annual basis the Treasurer determines District 204's *pro rata* share of the Treasurer's operation expenses and submits an invoice to District 204 for payment thereupon.

30. As alleged more particularly above, in order for District 204 to pay these invoices, District 204 would lawfully issue an order or voucher to the Treasurer for payment (or submit a certified copy of the school board minutes approving payments). The Treasurer would then transfer, via check, the funds from the appropriate Agency Account to its General Fund.

31. Prior to fiscal year 2000, District 204 paid the full amount of the invoices submitted for its *pro rata* share.

32. In fiscal years 2000 through 2002, the Treasurer submitted invoices totaling \$538,431 to District 204 for its *pro rata* share. For these fiscal years, however, District 204 paid only \$157,262 for its *pro rata* share.

33. In fiscal years 2003 through 2013, the Treasurer submitted invoices totaling \$2,397,189 to District 204 for its *pro rata* share. District 204, however, failed to pay any portion of the amount it owed, except for one payment of \$149,551.

34. District 204's payment of \$149,551 was for fiscal year 2013 and was made on October 8, 2014, after Township Trustees filed its original Verified Complaint for Declaratory Relief and while Township Trustees were in the process of drafting this Verified Amended

Complaint for Declaratory Relief. District 204's payment was drawn from an Agency Account at the First National Bank of La Grange.

35. In total, for fiscal years 2000 through 2013, the amount of District 204's unpaid *pro rata* share totals \$2,628,807, taking into account the payment just received.

36. District 204's failure to pay its *pro rata* share in full has created a deficit. As custodian for the districts, the Treasurer has not incurred a loss – the other fourteen districts it serves have incurred a loss to the detriment of the thirty-eight schools and nearly twenty thousand school children that they are charged with educating.

37. Because of its statutory obligations all of the districts it serves, the Treasurer brings this action seeking declaratory relief for the public purpose of recovering payment from District 204 so that the other districts the Treasurer serves will not suffer harm.

THE ERRONEOUS ALLOCATION OF INTEREST TO DISTRICT 204

38. Sections 8-7 and 8-8 of the School Code govern the depositing and investing of school funds.

39. Pursuant to Section 8-7, the Treasurer is "permitted to (i) combine moneys from more than one fund of a single school district for the purpose of investing such funds, and (ii) join with township and school treasurers, community college districts and educational service regions in investing school funds, community college funds and educational service region funds."

40. Section 8-7 of the School Code further provides, "When moneys of more than one fund of a single school district are combined for investment purposes or when moneys of a school district are combined with moneys of other school districts, community college districts or educational service regions, the moneys combined for such purposes shall be accounted for

separately in all respects, and the earnings from such investment shall be separately and individually computed and recorded, and credited to the fund or school district, community college district or educational service region, as the case may be, for which the investment was acquired."

41. Pursuant to the authority of the School Code, the Treasurer comingles funds for investment purposes from the districts it serves and allocates the interest earned on these investments among the districts.

42. The Treasurer allocates interest on a quarterly basis or as more frequently as is appropriate.

43. When the Treasurer allocates interest to a particular district (and when the Treasurer allocates the principal amongst the comingled funds) the Treasurer does so by making a journal entry. The Treasurer, in essence, makes an entry in its records that the district has been allocated a certain amount of interest generated by the comingled funds. The Treasurer does not write a check to the district, or otherwise physically turn custody of the interest over to the district. The interest stays in the custody of the Treasurer.

44. In fiscal years 1995 through 2012, the Treasurer erroneously allocated \$1,574,636.77 in interest on investments to District 204.

45. This over-allocation to District 204 necessarily means that the other districts which the Treasurer serves have been correspondingly under-allocated investment income. The Treasurer has not incurred a loss -- the other fourteen districts it serves have incurred a loss to the detriment of the thirty-eight schools and nearly twenty thousand school children that they are charged with educating.

46. To the extent District 204 has been over-allocated this interest, it means the other districts have necessarily been under-allocated interest. The Treasurer anticipates that once this interest is able to be properly reallocated among the districts, as examples, LaGrange School District 102 would get allocated approximately \$265,626 in interest and Argo Community High School District 217 would get allocated approximately \$319,077 in interest.

47. Because of its statutory obligations all of the districts it serves, the Treasurer brings this action seeking declaratory relief for the public purpose of reallocating interest so that the other districts it serves will not suffer harm.

DISTRICT 204'S NON-PAYMENT OF ITS OWN AUDIT EXPENSES

48. Article 3, Section 7 of the School Code requires that each school district have an audit of its accounts completed at least once a year by a person who is lawfully qualified to practice public accounting in Illinois. Further requirements regarding a school district's obligation to undertake annual audits are included in the Illinois Administrative Code.

49. These audits are ordered by and undertaken for the benefit of each individual district. Each individual district is, therefore, obligated to pay for its own audit expenses. Typically, the auditing firm that each district elects to use submits an invoice to that district and the district arranges for such invoice to be paid in the same way the district would arrange for any other account payable to be paid.

50. Thus, the district would ordinarily issue a lawful order or voucher (or submit a certified copy of the school board minutes approving payment) and the Treasurer would sign a check prepared by the district and drawn on that district's Agency Account.

51. Between 1993 and 2012, District 204 engaged Baker Tilly and/or its predecessor-in-interest to provide these audit and other professional services, including, but not limited to, preparation of audited financial statements and independent auditor's reports.

52. District 204's auditors sent their invoices to District 204.

53. Between 1993 and 2012, each district except District 204 paid for its audit through their Agency Account. The Treasurer did not pay for the districts' audits from its General Fund.

54. Between 1993 and 2012, however, the Treasurer improperly advanced money from its General Fund and paid \$511,068.60 for District 204's audit expenses.

55. The Treasurer has requested that District 204 reimburse the costs of District 204's audit expenses from 1993 to 2012, but District 204 has failed and refused to do so.

56. Since 2012, District 204 has paid its own audit expenses.

57. Because the Treasurer's General Fund is funded by the *pro rata* payment of all of the districts the Treasurer serves, the practical effect of District 204's failure and refusal to pay for its own audit expenses is that all of the other districts have to absorb the cost of District 204's audits.

58. In order to reimburse the Treasurer, District 204 would need only issue a lawful order or voucher (or submit a certified copy of the school board minutes approving payment) and the funds would be taken from District 204's Agency Account. The funds at issue remain and have always been within the Treasurer's custody.

59. The Treasurer has not incurred a loss through District 204's failure and refusal to pay for its own audit expenses – the other fourteen districts it serves have incurred a loss to the

detriment of the thirty-eight schools and nearly twenty thousand school children that they are charged with educating.

60. Because of its statutory obligations all of the districts it serves, the Treasurer brings this action seeking declaratory relief for the public purpose of recovering payment from District 204 so that the other districts it serves will not suffer harm.

THE TOWNSHIP TRUSTEES SEEK A DECLARATORY JUDGMENT

61. An actual controversy exists between Township Trustees and District 204 with respect to the disputes alleged herein and, by the terms and provisions of Section 2-701 of the Code of Civil Procedure, this Court is vested with the power to declare and adjudicate the rights and liabilities of the parties hereto and to grant such other and further relief as it deems necessary under the facts and circumstances presented.

WHEREFORE, Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East, respectfully prays that this Court enter a declaratory judgment in its favor and against the Defendant, Lyons Township High School District No. 204 and that this Court make the following findings as a matter of law:

A. Under Section 8-4 of the School Code, District 204 is required to pay its *pro rata* share of the Treasurer's compensation and expenses;

B. Between 2000 and 2013, District 204 has failed to pay its *pro rata* share of the Treasurer's compensation and expenses as required by Section 8-4 of the School Code; District 204's unpaid share of its *pro rata* share of the Treasurer's compensation and expenses for fiscal years 2000 through 2013 is \$2,628,807, or such other amount as may be proven at trial;

C. The Township Trustees are authorized to have the Treasurer debit \$2,628,807, or such other amount as may be proven at trial, from an Agency Account holding funds allocable to

District 204, or from funds otherwise allocated to District 204, in payment of District 204's *pro rata* share of the Treasurer's compensation and expenses incurred during fiscal years 2000 through 2013;

D. In the fiscal years 1995 through 2012, District 204 was erroneously allocated \$1,574,636.77, or such other amount as may be proven at trial, of interest on investments to which it was not entitled

E. The Township Trustees are authorized to reallocate the \$1,574,636.77 erroneously allocated to District 204 and properly allocate that sum amongst the districts;

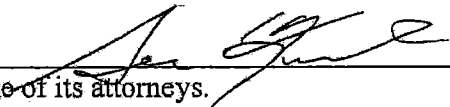
F. District 204 is obligated to pay \$511,068.60, or such other amount as may be proven at trial, in audit expenses that were incurred by the audits that District 204 performed and that was paid by the Treasurer from the Treasurer's General Fund;

G. The Township Trustees are authorized to have the Treasurer debit \$511,068.60, or such other amount as may be proven at trial, from an Agency Account holding funds allocable to District 204, or from funds otherwise allocated to District 204, in payment of District 204's audit expenses; and

H. Such other findings as may be equitable and appropriate.

Respectfully submitted,

TOWNSHIP TRUSTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12 EAST

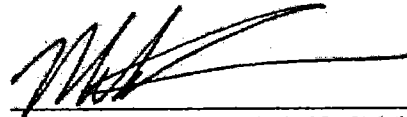
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Firm No. 48237
Service by e-mail will be accepted.

VERIFICATION

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

Dated: 10-21-14

A handwritten signature in black ink, appearing to read 'Michael Thiessen', written over a horizontal line.

Michael Thiessen, on behalf of Plaintiff

EXHIBIT 2

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12 EAST,

Plaintiff,

v.

LYONS TOWNSHIP HIGH SCHOOL DIST. 204,

Defendants.

No. 13 CH 23386

Hon. Sophia H. Hall

**DEFENDANT'S VERIFIED ANSWER AND AFFIRMATIVE DEFENSES
TO AMENDED COMPLAINT FOR DECLARATORY RELIEF**

Defendant, LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204 ("District 204"), by and through its undersigned attorneys, states as follows for its answer to the Verified Amended Complaint for Declaratory Relief filed by plaintiff, TOWNSHIP TRUSTEES OF SCHOOLS TOWNSHIP 38 NORTH, RANGE 12 EAST ("Township Trustees"):

THE PARTIES, JURISDICTION AND VENUE

1. Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East ("Township Trustees"), is a corporate entity organized under the laws of the State of Illinois with its principal office in LaGrange Park, Cook County, Illinois.

ANSWER: Admit only that Township Trustees is a local public entity organized under the laws of the State of Illinois with its principal office located in LaGrange Park, Cook County, Illinois.

2. Defendant, Lyons Township High School District No. 204 ("District 204"), is a corporate entity organized under the laws of the State of Illinois with its principal office in LaGrange, Cook County, Illinois.

ANSWER: Admit only that District 204 is a local public entity organized under the laws of the State of Illinois with its principal office located in LaGrange, Cook County, Illinois.

EXHIBIT

2

3. District 204 is subject to the personal jurisdiction of this Court because it is an entity organized under the laws of the State of Illinois.

ANSWER: Admit.

4. Venue is proper in Cook County because District 204 has its principal office in Cook County and because the transactions, or some part thereof, out of which the cause of action alleged herein arose occurred in Cook County.

ANSWER: Admit.

THE ROLE OF THE TOWNSHIP TRUSTEES AND TREASURER

5. Pursuant to the Illinois School Code, 105 ILCS 5/1 et seq. (the "School Code"), and more particularly Section 8-1 thereof, the Township Trustees, who are elected by and responsible to the voters within Lyons Township, have appointed the Lyons Township School Treasurer (the "Treasurer") to serve as the statutorily-appointed treasurer for the school and other educational districts within Lyons Township for which the Township Trustees are responsible.

ANSWER: Admit that Township Trustees is comprised of board members who were elected by voters within Lyons Township, and that they are required to operate pursuant to the provisions of the Illinois School Code, including Section 8-1, and other applicable Illinois laws. Admit that Township Trustees appointed various individuals to serve as the Lyons Township School Treasurer (the "Treasurer"), and that the Treasurer is legally required to conduct his/her activities pursuant to the provisions of the Illinois School Code and other applicable Illinois laws. The provisions of the Illinois School Code are the best evidence of the duties, responsibilities, and limitations of the activities of Township Trustees and the Treasurer, and District 204 denies the allegations of Paragraph 5 to the extent they are inconsistent with the provisions of the Illinois School Code. Deny the remaining allegations, if any, of Paragraph 5.

6. These school and other educational districts for which the Township Trustees are responsible, and for which the Treasurer provides financial services, include District 204 and: Western Springs School District 101; LaGrange School District 102; Lyons School District 103; Cook County School District 104; LaGrange School District 105; Highlands School District 106; Pleasantdale School District 107; Willow Springs School District 108; Indian Springs School District 109; Argo Community High School District 217; LaGrange Area Department of Special

Education, which serves students from fifteen area school districts; Intermediate Service Center #2, which serves forty school districts in western Cook County; Lyons Township Elementary School District Employee Benefits Cooperative; and the Lyons Township Elementary School District Employee Benefits Cooperative.

ANSWER: Admit that Township Trustees has purported to provide limited financial services to District 204 and to the other specific school districts listed in Paragraph 6. District 204 lacks knowledge or information sufficient to form a belief as to the truth or falsity of Township Trustees' allegations that it actually "provides financial services" to those other specific school districts. Deny the remaining allegations, if any, of Paragraph 6.

7. The above school districts contain thirty-eight schools servicing almost 20,000 students.

ANSWER: District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 7.

8. The districts within Lyons Township comprise a Class II county school unit within the meaning of the School Code.

ANSWER: The allegations of Paragraph 8 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the various relevant Class types, and District 204 denies the allegations of Paragraph 8 to the extent they are inconsistent with the provisions of the Illinois School Code.

9. The duties of the Township Trustees and the Treasurer are set out in Articles 5 and 8 of the School Code, respectively.

ANSWER: The allegations of Paragraph 9 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code and other Illinois laws are the best evidence of Township Trustees' and the Treasurer's duties and responsibilities, and District 204 denies the allegations of Paragraph

9 to the extent they are inconsistent with the provisions of the Illinois School Code or other Illinois laws.

10. As alleged more specifically herein, the obligation of the Treasurer is, in pertinent part, to take custody of public funds for the benefit of the districts it serves (with such funds coming from property taxes and other sources), invest those funds for the benefit of these districts, and pay such amounts to those persons and entities as it is lawfully instructed to pay by the districts it serves, whether such payments are for payroll or other purposes.

ANSWER: The allegations of Paragraph 10 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code and other Illinois laws are the best evidence of the Treasurer's obligations, and District 204 denies the allegations of Paragraph 10 to the extent they are inconsistent with the provisions of the Illinois School Code or other Illinois laws.

11. The obligation of the Treasurer to serve the financial needs of these districts, including managing the public funds upon which they depend and paying their bills, enables the districts to fulfill one of the most important public obligations of government: the obligation to educate. It is the public policy of the State of Illinois, as expressed through Article X, Section I of its Constitution, that "[a] fundamental goal of the People of the State is the educational development of all persons to the limits of their capabilities."

ANSWER: Admit that Paragraph 11 partially quotes from Article X, Section I of the Illinois Constitution of 1970. The remaining allegations of Paragraph 11 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code and other Illinois laws are the best evidence of the Treasurer's obligations, and District 204 denies the allegations of Paragraph 11 to the extent they are inconsistent with the provisions of the Illinois School Code or other Illinois laws. Answering further, the Illinois Constitution of 1970, Illinois statutes, and Illinois case law are the best evidence of the public policy of the State of Illinois, and District 204 denies the allegations of Paragraph 11 to the extent they are inconsistent with those sources of law.

12. Pursuant to Section 8-17 of the School Code, the Treasurer is to receive public funds, including property taxes, and hold those funds for the benefit of the school and other

educational districts it serves in furtherance of their obligation to provide for the education of students within Lyons Township.

ANSWER: The allegations of Paragraph 12 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 12 to the extent they are inconsistent with the provisions of the Illinois School Code.

13. Pursuant to Section 8-7 of the School Code, the Treasurer is, "the only lawful custodian of all school funds."

ANSWER: Admit that Paragraph 13 partially quotes from Section 8-7 of the Illinois School Code. The remaining allegations of Paragraph 13 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 13 to the extent they are inconsistent with the provisions of the Illinois School Code.

14. Section 8-6 of the School Code requires that the Treasurer "have custody of the school funds and shall keep in a cash book separate balances."

ANSWER: Admit that Paragraph 14 partially quotes from Section 8-6 of the Illinois School Code. The remaining allegations of Paragraph 14 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 14 to the extent they are inconsistent with the provisions of the Illinois School Code.

15. In accordance with Section 8-6, the Treasurer is required to maintain cash balances, by fund, for each district which it serves and the Treasurer is obligated to reconcile such balances with the respective cash balances shown by each district.

ANSWER: The allegations of Paragraph 15 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 15 to the extent they are inconsistent with the provisions of the Illinois School Code.

16. Section 8-17 of the School Code also imposes upon the Treasurer the responsibility for all receipts, disbursements, and investments arising out of the operation of all the school districts being served by the Treasurer.

ANSWER: The allegations of Paragraph 16 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 16 to the extent they are inconsistent with the provisions of the Illinois School Code.

17. With respect to paying such amounts as each district may owe, Section 8-16 of the School Code requires that the Treasurer make payment on behalf of the districts it serves out of the funds allocated to such districts, but "only upon an order of the school board signed by the president and clerk or secretary or by a majority of the board"

ANSWER: Admit that Paragraph 17 partially quotes from Section 8-16 of the Illinois School Code. The remaining allegations of Paragraph 17 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 17 to the extent they are inconsistent with the provisions of the Illinois School Code.

18. Sections 10-18 and 10-20.19 of the School Code provide further detail as to the procedure to be followed in submitting the above orders for payment. The form of order is specifically provided for in Section 10-18.

ANSWER: The allegations of Paragraph 18 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 18 to the extent they are inconsistent with the provisions of the Illinois School Code.

19. Section 10-20.19 also allows a board to choose to substitute a certified copy of the portions of the board minutes, properly signed by the secretary and president, or a majority of the board, showing all bills approved for payment by the board and clearly showing to whom, and for what purpose each payment is to be made by the Treasurer, and to what budgetary item each payment shall be debited. That certified copy provides "full authority" to the Treasurer to make the payments. A voucher system may also be used so long as it provides the same information.

ANSWER: The allegations of Paragraph 19 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 19 to the extent they are inconsistent with the provisions of the Illinois School Code.

20. In order to make payments as lawfully instructed by the districts which it serves, the Treasurer utilizes what are called "Agency Accounts" at local banks.

ANSWER: District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 20.

21. When a district has provided lawful instruction to the Treasurer to issue payment, the Treasurer effectuates the payment drawing on the appropriate Agency Account.

ANSWER: The allegations of paragraph 21 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 21.

22. Agency Accounts are funded by transfer from other accounts in the custody of the Treasurer and maintained and utilized by the Treasurer to hold funds belonging to multiple districts and for which there is not an immediate need. The funds in the Agency Account, both before and after they arrive in the Agency Account, remain in the custody of the Treasurer.

ANSWER: The allegations of paragraph 22 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 22.

23. The districts do not have signatory power on the Agency Accounts, with the exception of certain revolving and flex-spending accounts not at issue in this litigation. The Treasurer has signatory power on the Agency Accounts.

ANSWER: The allegations of paragraph 23 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 23.

DISTRICT 204'S FAILURE TO PAY FOR ITS PRO RATA SHARE OF THE TREASURER'S
OPERATIONAL EXPENSES

24. The Treasurer has its own costs to run its office and provide its financial services to the districts it serves, including the Treasurer's compensation and expenses of the Treasurer's office. The Treasurer pays these operating expenses from its General Fund, which is funded through each district's Agency Account as alleged more fully below.

ANSWER: District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 24.

25. Section 8-4 of the School Code requires that each district "shall pay a proportionate share of the compensation of the township treasurer serving such district or districts and a proportionate share of the expenses of the treasurer's office."

ANSWER: Admit that Paragraph 25 partially quotes from Section 8-4 of the Illinois School Code. The remaining allegations of Paragraph 25 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of school districts' payment obligations, and

District 204 denies the allegations of Paragraph 25 to the extent they are inconsistent with the provisions of the Illinois School Code.

26. Pursuant to Section 8-4 of the School Code, each district's pro rata share "shall be determined by dividing the total amount of all school funds handled by the township treasurer by such amount of the funds as belong to each such . . . district."

ANSWER: Admit that Paragraph 26 partially quotes from Section 8-4 of the Illinois School Code. The remaining allegations of Paragraph 26 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the proper manner in which to determine any pro rata share, and District 204 denies the allegations of Paragraph 26 to the extent they are inconsistent with the provisions of the Illinois School Code.

27. This statutory formula obligates the districts with the most money to pay the largest proportion of the costs. For example, if a district is allocated twenty-five percent of all public funds handled by the Treasurer, then it is required by the School Code to pay twenty-five percent of the Treasurer's operating expenses.

ANSWER: The allegations of Paragraph 27 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the proper manner in which to determine any pro rata share, and District 204 denies the allegations of Paragraph 27 to the extent they are inconsistent with the provisions of the Illinois School Code.

28. This statutory formula is mandatory and can only be changed by the General Assembly. No district may unilaterally decide it does not wish to pay its pro-rata share, nor may any private agreements be made between public bodies in violation of the School Code. A district is required to pay the amount calculated and has no statutory authority to deduct any of its own expenses from its pro rata share it owes.

ANSWER: The allegations of Paragraph 28 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, District 204 denies the allegations of Paragraph 28.

29. In accordance with the statutory requirements of the School Code, on an annual basis the Treasurer determines District 204's pro rata share of the Treasurer's operation expenses and submits an invoice to District 204 for payment thereupon.

ANSWER: Admit that the Treasurer has submitted certain invoices to District 204 that purportedly related to District 204's pro rata share of the Treasurer's annual operating expenses. Deny the remaining allegations of Paragraph 29.

30. As alleged more particularly above, in order for District 204 to pay these invoices, District 204 would lawfully issue an order or voucher to the Treasurer for payment (or submit a certified copy of the school board minutes approving payments). The Treasurer would then transfer, via check, the funds from the appropriate Agency Account to its General Fund.

ANSWER: Admit District 204 paid certain invoices submitted by the Treasurer, including by issuing vouchers or checks to the Treasurer for payment. District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegation that "The Treasurer would then transfer, via check, the funds from the appropriate Agency Account to its General Fund." Deny the remaining allegations of Paragraph 30.

31. Prior to fiscal year 2000, District 204 paid the full amount of the invoices submitted for its pro rata share.

ANSWER: Admit that prior to fiscal year 1999, District 204 paid the Treasurer's invoices in full. Deny that the Treasurer's invoices prior to fiscal year 2000 reflected District 204's proper or lawful pro rata share of expenses. Deny the remaining allegations of Paragraph 31.

32. In fiscal years 2000 through 2002, the Treasurer submitted invoices totaling \$538,431 to District 204 for its pro rata share. For these fiscal years, however, District 204 paid only \$157,262 for its pro rata share.

ANSWER: Admit District 204 received invoices from the Treasurer for fiscal years 2000, 2001, and 2002 totaling \$538,431.00 before agreed chargebacks for services District 204 supplied, which were applied and credited for the respective fiscal years. Admit District 204 mailed payments for the remaining balances to the Treasurer for fiscal years 2000,

2001, and 2002 in the total amount of \$98,188.75, consistent with the prior agreement between District 204 and the Township Trustees. Deny the remaining allegations of Paragraph 32.

33. In fiscal years 2003 through 2013, the Treasurer submitted invoices totaling \$2,397,189 to District 204 for its pro rata share. District 204, however, failed to pay any portion of the amount it owed, except for one payment of \$149,551.

ANSWER: Admit District 204 made a payment in the amount of \$149,551.00 toward fiscal year 2013. Deny the remaining allegations of Paragraph 33.

34. District 204's payment of \$149,551 was for fiscal year 2013 and was made on October 8, 2014, after Township Trustees filed its original Verified Complaint for Declaratory Relief and while Township Trustees were in the process of drafting this Verified Amended Complaint for Declaratory Relief. District 204's payment was drawn from an Agency Account at the First National Bank of La Grange.

ANSWER: District 204 lacks knowledge or information sufficient to form a belief about the allegation that any payment was "drawn from an Agency Account." Admit the remaining allegations of Paragraph 34.

35. In total, for fiscal years 2000 through 2013, the amount of District 204's unpaid pro rata share totals \$2,628,807, taking into account the payment just received.

ANSWER: Deny.

36. District 204's failure to pay its pro rata share in full has created a deficit. As custodian for the districts, the Treasurer has not incurred a loss — the other fourteen districts it serves have incurred a loss to the detriment of the thirty-eight schools and nearly twenty thousand school children that they are charged with educating.

ANSWER: Deny.

37. Because of its statutory obligations all of the districts it serves, the Treasurer brings this action seeking declaratory relief for the public purpose of recovering payment from District 204 so that the other districts the Treasurer serves will not suffer harm.

ANSWER: Deny.

THE ERRONEOUS ALLOCATION OF INTEREST TO DISTRICT 204

38. Sections 8-7 and 8-8 of the School Code govern the depositing and investing of school funds.

ANSWER: The allegations of Paragraph 38 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code and other Illinois law are the best evidence of the proper manner of depositing and investing school funds, and District 204 denies the allegations of Paragraph 38 to the extent they are inconsistent with the provisions of the Illinois School Code or other Illinois law.

39. Pursuant to Section 8-7, the Treasurer is "permitted to (i) combine moneys from more than one fund of a single school district for the purpose of investing such funds, and (ii) join with township and school treasurers, community college districts and educational service regions in investing school funds, community college funds and educational service region funds."

ANSWER: Admit that Paragraph 39 partially quotes from Section 8-7 of the Illinois School Code. The remaining allegations of Paragraph 39 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 39 to the extent they are inconsistent with the provisions of the Illinois School Code.

40. Section 8-7 of the School Code further provides, "When moneys of more than one fund of a single school district are combined for investment purposes or when moneys of a school district are combined with moneys of other school districts, community college districts or educational service regions, the moneys combined for such purposes shall be accounted for separately in all respects, and the earnings from such investment shall be separately and individually computed and recorded, and credited to the fund or school district, community college district or educational service region, as the case may be, for which the investment was acquired."

ANSWER: Admit that Paragraph 40 partially quotes from Section 8-7 of the Illinois School Code. Deny that Paragraph 40 includes the entire text of Section 8-7 of the Illinois

School Code, and deny the allegations of Paragraph 40 to the extent they are inconsistent with Section 8-7 of the Illinois School Code.

41. Pursuant to the authority of the School Code, the Treasurer comingles funds for investment purposes from the districts it serves and allocates the interest earned on these investments among the districts.

ANSWER: District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegation that "the Treasurer comingles funds for investment purposes from the districts it serves and allocates the interest earned on these investments among the districts." The remaining allegations of Paragraph 41 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of the Treasurer's duties, responsibilities, and obligations, and District 204 denies the allegations of Paragraph 41 to the extent they are inconsistent with the provisions of the Illinois School Code.

42. The Treasurer allocates interest on a quarterly basis or as more frequently as is appropriate.

ANSWER: Deny.

43. When the Treasurer allocates interest to a particular district (and when the Treasurer allocates the principal amongst the comingled funds) the Treasurer does so by making a journal entry. The Treasurer, in essence, makes an entry in its records that the district has been allocated a certain amount of interest generated by the comingled funds. The Treasurer does not write a check to the district, or otherwise physically turn custody of the interest over to the district. The interest stays in the custody of the Treasurer.

ANSWER: Deny.

44. In fiscal years 1995 through 2012, the Treasurer erroneously allocated \$1,574,636.77 in interest on investments to District 204.

ANSWER: Deny.

45. This over-allocation to District 204 necessarily means that the other districts which the Treasurer serves have been correspondingly under-allocated investment income. The Treasurer has not incurred a loss — the other fourteen districts it serves have incurred a loss to

the detriment of the thirty-eight schools and nearly twenty thousand school children that they are charged with educating.

ANSWER: Deny. District 204 further moves this Court to strike the inaccurate, self-serving, and politically-motivated allegations of Paragraph 46 regarding the supposed "loss" of allocations of interest to other school districts.

46. To the extent District 204 has been over-allocated this interest, it means the other districts have necessarily been under-allocated interest. The Treasurer anticipates that once this interest is able to be properly reallocated among the districts, as examples, LaGrange School District 102 would get allocated approximately \$265,626 in interest and Argo Community High School District 217 would get allocated approximately \$319,077 in interest.

ANSWER: Deny. District 204 further moves this Court to strike the inaccurate, self-serving, and politically-motivated allegations of Paragraph 46 regarding supposed allocations of interest to other school districts.

47. Because of its statutory obligations all of the districts it serves, the Treasurer brings this action seeking declaratory relief for the public purpose of reallocating interest so that the other districts it serves will not suffer harm.

ANSWER: Deny.

DISTRICT 204'S NON-PAYMENT OF ITS OWN AUDIT EXPENSES

48. Article 3, Section 7 of the School Code requires that each school district have an audit of its accounts completed at least once a year by a person who is lawfully qualified to practice public accounting in Illinois. Further requirements regarding a school district's obligation to undertake annual audits are included in the Illinois Administrative Code.

ANSWER: The allegations of Paragraph 48 state a legal conclusion to which no answer is required. To the extent an answer is deemed required, the provisions of the Illinois School Code are the best evidence of any audit requirement, and District 204 denies the allegations of Paragraph 48 to the extent they are inconsistent with the provisions of the Illinois School Code.

49. These audits are ordered by and undertaken for the benefit of each individual district. Each individual district is, therefore, obligated to pay for its own audit expenses. Typically, the auditing firm that each district elects to use submits an invoice to that district and

the district arranges for such invoice to be paid in the same way the district would arrange for any other account payable to be paid.

ANSWER: Deny.

50. Thus, the district would ordinarily issue a lawful order or voucher (or submit a certified copy of the school board minutes approving payment) and the Treasurer would sign a check prepared by the district and drawn on that district's Agency Account.

ANSWER: Deny.

51. Between 1993 and 2012, District 204 engaged Baker Tilly and/or its predecessor-in-interest to provide these audit and other professional services, including, but not limited to, preparation of audited financial statements and independent auditor's reports.

ANSWER: Admit.

52. District 204's auditors sent their invoices to District 204.

ANSWER: Admit.

53. Between 1993 and 2012, each district except District 204 paid for its audit through their Agency Account. The Treasurer did not pay for the districts' audits from its General Fund.

ANSWER: District 204 lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 53.

54. Between 1993 and 2012, however, the Treasurer improperly advanced money from its General Fund and paid \$511,068.60 for District 204's audit expenses.

ANSWER: Admit the Treasurer agreed to pay District 204's audit expenses for the years in question. Deny the remaining allegations of Paragraph 54.

55. The Treasurer has requested that District 204 reimburse the costs of District 204's audit expenses from 1993 to 2012, but District 204 has failed and refused to do so.

ANSWER: Admit that, in 2013, the Treasurer's office requested that District 204 reimburse the Treasurer for certain audit expenses the Treasurer previously paid, by agreement, and that District 204 has no obligation to reimburse the Treasurer's office for said expenses. Deny the remaining allegations of paragraph 55.

56. Since 2012, District 204 has paid its own audit expenses.

ANSWER: Admit.

57. Because the Treasurer's General Fund is funded by the pro rata payment of all of the districts the Treasurer serves, the practical effect of District 204's failure and refusal to pay for its own audit expenses is that all of the other districts have to absorb the cost of District 204's audits.

ANSWER: Deny.

58. In order to reimburse the Treasurer, District 204 would need only issue a lawful order or voucher (or submit a certified copy of the school board minutes approving payment) and the funds would be taken from District 204's Agency Account. The funds at issue remain and have always been within the Treasurer's custody.

ANSWER: Deny.

59. The Treasurer has not incurred a loss through District 204's failure and refusal to pay for its own audit expenses — the other fourteen districts it serves have incurred a loss to the detriment of the thirty-eight schools and nearly twenty thousand school children that they are charged with educating.

ANSWER: Deny.

60. Because of its statutory obligations all of the districts it serves, the Treasurer brings this action seeking declaratory relief for the public purpose of recovering payment from District 204 so that the other districts it serves will not suffer harm.

ANSWER: Deny.

THE TOWNSHIP TRUSTEES SEEK A DECLARATORY JUDGMENT

61. An actual controversy exists between Township Trustees and District 204 with respect to the disputes alleged herein and, by the terms and provisions of Section 2-701 of the Code of Civil Procedure, this Court is vested with the power to declare and adjudicate the rights and liabilities of the parties hereto and to grant such other and further relief as it deems necessary under the facts and circumstances presented.

ANSWER: District 204 asserts that it is entitled to a trial by jury on all contested facts at issue in this litigation. Subject to and without waiving that right, District 204 admits the remaining allegations of Paragraph 61.

WHEREFORE, defendant, LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204, respectfully requests that this Honorable Court: (1) enter judgment in favor of District 204 and against plaintiff, TOWNSHIP TRUSTEES OF SCHOOLS TOWNSHIP 38 NORTH, RANGE 12 EAST; (2) award District 204 its costs; and (3) grant such further relief as the Court deems just and reasonable.

AFFIRMATIVE DEFENSES

Defendant, LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204 ("District 204"), states as follows for its affirmative defenses to the Verified Amended Complaint for Declaratory Relief filed by plaintiff, TOWNSHIP TRUSTEES OF SCHOOLS TOWNSHIP 38 NORTH, RANGE 12 EAST ("Township Trustees"):

FACTS COMMON TO ALL AFFIRMATIVE DEFENSES

1. District 204 is a local public entity organized under the laws of the State of Illinois with its principal office located in LaGrange, Cook County, Illinois.
2. Township Trustees is a local public entity organized under the laws of the State of Illinois with its principal office located in LaGrange Park, Cook County, Illinois.
3. Township Trustees provides certain required, financial-related services to a limited number of school districts in Township 38 North, Range 12 East, including District 204.
4. District 204 and Township Trustees entered into an agreement in or around 1999 whereby District 204 agreed to perform certain financial-related services Township Trustees otherwise would have been obligated to perform on District 204's behalf.
5. By virtue of District 204 performing certain financial-related services Township Trustees was otherwise obligated to perform on District 204's behalf, Township Trustees saved millions of dollars in expenses it otherwise would have been obligated to incur in performing said services.

EXHIBIT 3

**EXHIBIT 3 IS THE AFFIDAVIT OF SUSAN BIRKENMAIER,
SEE SEPARATE BINDER**

EXHIBIT 4

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)	
TOWNSHIP 38 NORTH, RANGE 12)	
EAST,)	
)	
Plaintiff,)	
)	
v.)	No. 13 CH 23386
)	
LYONS TOWNSHIP HIGH SCHOOL)	
DISTRICT 204,)	
)	
Defendant.)	

The deposition of MICHAEL THEISSEN taken before Loretta A. Tyska, Certified Shorthand Reporter, taken pursuant to the provisions of the Illinois Code of Civil Procedure and the Rules of the Supreme Court thereof pertaining to the taking of depositions for the purpose of discovery at 20 North Clark Street, Suite 2500, Chicago, Illinois, commencing at 1:04 p.m. on the 16th day of February, 2017.

APPEARANCES:

MILLER, CANFIELD, PADDOCK and STONE, P.L.C.
 MR. BARRY P. KALTENBACH
 225 West Washington Street, Suite 2600
 Chicago, Illinois 60606
 Phone: (312) 460-4251
 Email: Kaltенbach@millercanfield.com

Appeared on behalf of the Plaintiff,

HOFFMAN LEGAL
 MR. JAY R. HOFFMAN
 20 North Clark Street, Suite 2500
 Chicago, Illinois 60602
 Phone: (312) 899-0899
 Email: Jay@hoffmanlegal.com
 Appeared on behalf of the Defendant.

* * * * *

MICHAEL THEISSEN,

a witness, having been first administered an oath,
 was examined and testified as follows:

EXAMINATION

BY MR. HOFFMAN:

Q. Sir, can you provide me with your highest
 legal of education?

A. I have a master's in management with an
 emphasis on finance and marketing.

Q. Where did you get that from?

A. Willamette University in Salem, Oregon.

Q. I am very familiar with that area. My
 best friends lived in Salem for many years.

A. That, of course, means you know how to
 pronounce wine.

Q. Pinot noir.

A. Exactly.

Q. I think I like the craft beers better.

(Discussion off the record.)

BY MR. HOFFMAN:

Q. What, sir, is your professional
 background?

A. How far back do you want to go? From my
 paperboy days or lawn mowing?

INDEX	
MICHAEL THEISSEN	PAGE
Examination By Mr. Hoffman	4
EXHIBITS	
No. DESCRIPTION	PAGE
Exhibit 1 (Release and assignment of claim)	10
Exhibit 2 (Final Release, Settlement, and Assignment Agreement)	10
Exhibit 3 (Proof of Claim)	11
Exhibit 4 (Deposition of Kelly Bradshaw)	17
Exhibit 5 (Order on summary judgment)	17
Exhibit 6 (Article from Pioneer Press)	20
Exhibit 7 (Testimony of Judge Hartigan)	34
Exhibit 8 (September 5, 2013 memo)	54
Exhibit 9 (Memo dated November 7, 2013)	54
Exhibit 10 (Request for Posting Entry and notes)	78
Exhibit 11 (TTO general ledger)	79
Exhibit 12 (Letter from Bob Healey to Lisa Beckwith dated August 18, 1999)	134
Exhibit 13 (Letter from Michael Theissen to Mike Pera dated March 8, 2013, and attached invoices)	150
(EXHIBITS RETAINED BY MR. HOFFMAN)	

Q. Let's work backwards from now.

A. Okay. So right now I'm an independent
 consultant and investor in a number of businesses.
 Prior to that -- that's been about 18 years. At
 that point before I left I was at Mesirow Financial.
 I was an investment banker.

Q. How long were you at Mesirow for?

A. Well, I was at Mesirow and Mesirow Stein,
 so I was at Stein & Company doing financial
 structuring and program management for sports
 facilities and large public-private partnerships.
 Q. Did you have a hand in Toyota Park?
 A. I did not have a hand in Toyota Park, no.
 I worked on Toyota Park as an independent consultant
 related to a possible naming rights deal, but not in
 the structuring and development of it.

Q. Okay. And then when did you become an
 independent consultant, approximately?

A. Probably 18 years ago, 20 years ago. When
 I was at Mesirow, I had both a Series 7 and 63,
 which would allow me to buy, sell, and trade stocks,
 bonds, provide investment advice for my clients, as
 we would do financial structuring both on the debt
 and equity side.

1 of overpayment for fiscal year '06 to LT was
2 \$391,000 plus change?

3 **A. Nope. I do not know how she would get to**
4 **that.**

5 Q. Is it possible that there was no real
6 rhyme or reason as to how Bob Healy actually
7 distributed interest as opposed to considering the
8 interest that was earned and the interest that was
9 paid?

10 **A. Is it possible?**

11 Q. Yeah.

12 **A. It's possible.**

13 Q. And is it possible that his lack of
14 precision, if you will, wasn't solely focused on
15 District 204, but actually affected all the
16 districts?

17 **A. Of course, because if it affected one, it**
18 **affects all.**

19 Q. What I'm saying is --

20 **A. As a pooled investment, if in the event**
21 **they were overpaid or underpaid, that affects all**
22 **school districts.**

23 Q. If Bob Healy was making arbitrary payments
24 of interest, are you saying that his arbitrary

1 payments of interest would have always favored
2 District 204?

3 **A. I'm not saying that. I'm not saying that**
4 **at all. What I'm saying is if any school was**
5 **overpaid or underpaid, it affects all school**
6 **districts because it takes out of the collective**
7 **investment pool. So if the collective investment**
8 **pool, if somebody is paid more or less, then it**
9 **affects the overall interest of the pool, which then**
10 **affects the other school districts when it's time**
11 **for their distribution.**

12 Q. All right.

13 Let me show you a document that we've
14 previously marked as Conway -- we're going to switch
15 gears and we're going to talk about this claim that
16 the TTO made for alleged underpayments of pro-rata
17 expenses. Okay?

18 **A. Okay.**

19 Q. I'm going to show you the minutes of a
20 meeting that the Board of Trustees held on March 21,
21 2000, that's Conway Deposition Exhibit Number 5.
22 It's two pages of minutes as well as an attachment
23 of a February 29, 2000 email from Lisa Beckwith at
24 LT to Bob Healy.

1 **A. Memo.**

2 MR. KALTENBACH: No, you said email.

3 MR. HOFFMAN: Memo. You're right it's not an
4 email. I remember there used to be such thing as
5 memos at one time.

6 BY MR. HOFFMAN:

7 Q. So you see the minutes of the March 21,
8 2000 meeting, right?

9 **A. Yes.**

10 Q. And you're very familiar with these
11 minutes and you've talked to the press and other
12 people about these minutes, right?

13 **A. Yes.**

14 Q. Okay. When was the first time that you
15 personally saw the minutes of this meeting?

16 **A. Gee, I don't know. Four years ago.**

17 Q. Did you see the minutes of this meeting
18 prior to the board authorizing the TTO's attorneys
19 to file the lawsuit in this case?

20 **A. I believe we did, yes. I believe I did.**

21 Q. All right. Terrific. Have you ever
22 spoken with Russell Hartigan about what occurred at
23 this meeting on March 21st of 2000?

24 **A. No. Like I said, I don't think I've ever**

1 **met Russell Hartigan.**

2 Q. Have you ever spoken to -- Okay. And fair
3 enough that you've never spoken with Bob Healy about
4 that subject either, have you?

5 **A. No, I have not.**

6 Q. And Joseph Nicola is unavailable because
7 he's deceased, right?

8 **A. Yes.**

9 Q. And Donna Millage was not present at this
10 meeting, correct?

11 **A. According to the minutes, no. I don't**
12 **know Donna. So if she was marked as absent, that's**
13 **what I have to go on.**

14 Q. You have no reason to doubt that, right?

15 **A. No.**

16 Q. Okay. So the three people who were at
17 this meeting were Russell Hartigan, Joseph Nicola,
18 and Bob Healy, correct?

19 **A. Yes. At least those three.**

20 Q. Okay. And the two people amongst them who
21 are living, Russell Hartigan and Bob Healy, were
22 deposed in this case. Do you know that?

23 **A. Yes.**

24 Q. And do you know what they said about this

EXHIBIT 5

1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF C O O K)
3

4 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
5 COUNTY DEPARTMENT - CHANCERY DIVISION

6 TOWNSHIP TRUSTEES OF)
7 SCHOOLS TOWNSHIP 38)
8 NORTH, RANGE 12 EAST,)
9 Plaintiff,)
 vs.) No. 13 CH 23386
10 LYONS TOWNSHIP HIGH)
11 SCHOOL DISTRICT 204,)
12 Defendant.)
13

14 The deposition of TIMOTHY KILREA, called
15 for examination, taken pursuant to the provisions
16 of the Code of Civil Procedure and the Rules of the
17 Supreme Court of the State of Illinois pertaining to
18 the taking of depositions for the purpose of
19 discovery, taken before JEANINE WATKINS,
20 CSR No. 084-001629, a Certified Shorthand Reporter
21 of said state, on February 21, 2017, at the hour of
22 1:00 p.m. at 225 West Washington Street,
23 Suite 2600, Chicago, Illinois, pursuant to notice.
24

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 MILLER, CANFIELD, PADDOCK and STONE, PLC</p> <p>4 BY: MR. BARRY P. KALTENBACH and</p> <p>5 MR. GERALD E. KUBASIAK</p> <p>6 225 West Washington Street, Suite 2600</p> <p>7 Chicago, Illinois 60606</p> <p>8 (312) 460-4251</p> <p>9 Kaltenbach@millercanfield.com</p> <p>10</p> <p>11 Appeared on behalf of the Plaintiff;</p> <p>12</p> <p>13 HOFFMAN LEGAL, by</p> <p>14 MR. JAY R. HOFFMAN</p> <p>15 20 North Clark Street, Suite 2500</p> <p>16 Chicago, Illinois 60602</p> <p>17 (312) 899-0899</p> <p>18 jay@hoffmanlegal.com</p> <p>19</p> <p>20 Appeared on behalf of the Defendant.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 4</p> <p>1 Operational Services 112</p> <p>2 No. 9 Email between Timothy Kilrea and</p> <p>3 Susan Birkenmaier 6-14 127</p> <p>4 No. 10 Copy of a letter from</p> <p>5 Timothy Kilrea to</p> <p>6 Susan Birkenmaier 10-8-14 131</p> <p>7 No. 11 Letter from Timothy Kilrea to</p> <p>8 Township Trustees 10-14-14 132</p> <p>9 No. 12 9-29-14 Letter signed by</p> <p>10 three trustees 135</p> <p>11 No. 13 Letter to Susan Birkenmaier</p> <p>12 dated 10-13-15 137</p> <p>13</p> <p>14 (ALL EXHIBITS WERE RETAINED BY MR. KALTENBACH)</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2</p> <p>3 WITNESS</p> <p>4 MR. TIMOTHY KILREA</p> <p>5</p> <p>6 Examination by Mr. Kaltenbach 4</p> <p>7</p> <p>8 EXHIBITS</p> <p>9</p> <p>10 NUMBER MARKED FOR ID</p> <p>11</p> <p>12 No. 1 Amended Notice of Deposition 12</p> <p>13 No. 2 Excerpt from LT Policy Manual 27</p> <p>14 No. 3 204 Policy Manual</p> <p>15 Section 1.09.01 33</p> <p>16 No. 4 204 Policy Manual</p> <p>17 Section 1.11.14 46</p> <p>18 No. 5 Agenda for Board of Education</p> <p>19 Meeting 6-19-2000 55</p> <p>20 No. 6 March 2000 Meeting Minutes 65</p> <p>21 No. 7 Proposed Motion for Leave and</p> <p>22 Exhibit A 75</p> <p>23 No. 8 Policy Manual Pages, three sections,</p> <p>24 First Page titled</p>	<p style="text-align: right;">Page 5</p> <p>1 (The witness was duly sworn.)</p> <p>2 TIMOTHY KILREA</p> <p>3 having been first duly sworn, was examined and</p> <p>4 testified as follows:</p> <p>5 EXAMINATION</p> <p>6 BY MR. KALTENBACH:</p> <p>7 Q. Thank you. This is the deposition of</p> <p>8 Dr. Timothy Kilrea, and it's also by agreement of</p> <p>9 the parties. The Rule 206(a)(1) Deposition of Lyons</p> <p>10 Township High School District Number 204.</p> <p>11 Dr. Kilrea, do you usually refer to the</p> <p>12 district as LT?</p> <p>13 A. LT is fine.</p> <p>14 Q. Okay. I'll try to do that just to avoid</p> <p>15 confusion.</p> <p>16 A. Or 204.</p> <p>17 Q. If at some point I slip and call it 204,</p> <p>18 let me know if you're ever not sure to whom I'm</p> <p>19 referring.</p> <p>20 My client's name is a bit of a mouthful.</p> <p>21 It is Township Trustees of Schools Township 38 North</p> <p>22 Range 12 East. If I just refer to that as either</p> <p>23 the Township Trustees or the TTO, will you</p> <p>24 understand to whom I'm referring?</p>

2 (Pages 2 - 5)

<p style="text-align: right;">Page 14</p> <p>1 Q. Okay.</p> <p>2 A. I have read depositions that were</p> <p>3 available. Reviewed some documents. That about</p> <p>4 summarizes it.</p> <p>5 Q. Did you do those things specifically to</p> <p>6 prepare to testify today, or were you doing those</p> <p>7 things just in terms of kind of keeping an eye on</p> <p>8 the lawsuit?</p> <p>9 A. It's definitely the latter. There has been</p> <p>10 a lot of documents shared. There is a lot of</p> <p>11 things. So, it's kind of keep up to speed on what's</p> <p>12 happening. I think I've been somewhat up to speed</p> <p>13 as to what's been happening. So, not just to</p> <p>14 prepare for today.</p> <p>15 Q. Is there anything you did other than meet</p> <p>16 with your attorney, that you reviewed specifically</p> <p>17 to prepare for today?</p> <p>18 A. I don't follow that question.</p> <p>19 Q. Okay. So, you've been reviewing documents</p> <p>20 and looking at deposition transcripts kind of as</p> <p>21 they've been generated in the lawsuit?</p> <p>22 A. Yes.</p> <p>23 Q. And certainly that also helped you prepare</p> <p>24 for today, correct?</p>	<p style="text-align: right;">Page 16</p> <p>1 other than the new pleading, do you -- for instance,</p> <p>2 did you review the deposition exhibits that went</p> <p>3 with those depositions?</p> <p>4 A. Not after the first time I read -- I read</p> <p>5 them. And I didn't even look at the documents that</p> <p>6 were referred to in the depositions. I read the</p> <p>7 depositions by text.</p> <p>8 Q. Okay. Do you recall what documents it was</p> <p>9 or -- do you recall what documents you've reviewed</p> <p>10 that have given you background knowledge for today?</p> <p>11 A. I think the information from Friday. That</p> <p>12 the -- the filing. The filing. I've looked at the</p> <p>13 interrogatories. But again, just glanced at. I</p> <p>14 don't think there is any other documentation that</p> <p>15 specifically I've looked at for today.</p> <p>16 Q. Did you take any notes in preparation for</p> <p>17 your deposition today?</p> <p>18 A. No, I did not.</p> <p>19 Q. I want to ask you a little bit, sir, about</p> <p>20 the organization of District 204, and rather than</p> <p>21 stab in the dark, I'm going to make a couple of</p> <p>22 guesses here. Kind of from a pyramidal structure</p> <p>23 going down, at the top is it the Board of Education?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 15</p> <p>1 A. Yes. I'd say, yeah.</p> <p>2 Q. Is there anything you did specifically just</p> <p>3 for today, any specific things you looked at?</p> <p>4 A. No. Well, obviously the new filing.</p> <p>5 Q. Sure.</p> <p>6 A. Yes. That's what was prepared, or that's</p> <p>7 what I prepared for for today.</p> <p>8 Q. Did you interview or speak with any</p> <p>9 District 204 agents to prepare for today?</p> <p>10 A. No.</p> <p>11 Q. Do you recall whose deposition transcripts</p> <p>12 you reviewed?</p> <p>13 A. Yes. I may miss one or two.</p> <p>14 Q. That's fair.</p> <p>15 A. I looked at Dr. Kelly's. Mr. Healy's.</p> <p>16 Judge Hartigan's. Ms. Bradshaw. I think</p> <p>17 Dr. Grimes. All the ones that I think have come</p> <p>18 through --</p> <p>19 Q. Okay.</p> <p>20 A. -- I've looked at. Have I studied them</p> <p>21 intently? No. Have I read them? They are not the</p> <p>22 most exciting things to read, but I have glanced</p> <p>23 them over, yes.</p> <p>24 Q. In terms of documents that you reviewed,</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. And how many board members are there?</p> <p>2 A. There are seven board members.</p> <p>3 Q. To your knowledge has that been -- strike</p> <p>4 that. I'm not going to ask to your knowledge.</p> <p>5 Has that been the same, let's say starting</p> <p>6 at least in the 1990s and continuing?</p> <p>7 A. Yes.</p> <p>8 Q. And then is the Board of Education, who is</p> <p>9 the apex person there? Are they referred to as the</p> <p>10 president?</p> <p>11 A. We have three officers on the Board of</p> <p>12 Education.</p> <p>13 Q. Okay.</p> <p>14 A. A president, a vice president, and a</p> <p>15 secretary.</p> <p>16 Q. And then there is -- I'm sorry -- four</p> <p>17 other members that are not officers, correct?</p> <p>18 A. I believe there are referred to as members</p> <p>19 at large.</p> <p>20 Q. What does the president do, generally</p> <p>21 speaking?</p> <p>22 A. The president is a pro tem member of all</p> <p>23 the committees. The president drives the agenda.</p> <p>24 Approves the agenda before posting for the Open</p>

Page 18

1 Meetings Act. Is the point person during meetings,
 2 actually runs the business portion of the meetings
 3 through the agenda. Is usually spokesperson for the
 4 Board of Education. And is elected by board
 5 members. The position is elected by board members.
 6 Q. Are all of the board members elected by the
 7 public?
 8 A. They are.
 9 Q. Is the vice president and secretary, are
 10 they also elected by the other board members?
 11 A. Yes.
 12 Q. How long are the terms for the officers?
 13 A. Usually two years. There have been some
 14 continuation, but usually it's two years, and with
 15 every election cycle there is a restructuring of the
 16 board. And there have been times where the
 17 presidents remain the time.
 18 We had a president for approximately 14
 19 years, I believe, so some of the positions do remain
 20 the same, but they get revisited every two years.
 21 Q. In terms of, what's the next level down or
 22 the next position down after the Board of Education?
 23 A. The superintendent. That would be me.
 24 Q. That's you. Okay. Fair enough.

Page 19

1 A. The position.
 2 Q. I'm sorry. The position of superintendent.
 3 A. The position of superintendent.
 4 Q. It wasn't you the entire time that we're
 5 talking about here?
 6 A. Correct.
 7 Q. Are you the senior-most person charged with
 8 the day-to-day running of LT?
 9 A. I would say yes.
 10 Q. Who -- I'm not going to go all the way down
 11 to staff and such, but what's just the next level
 12 down under you?
 13 A. I have a cabinet that I work with. They
 14 are district level directors. Some districts they
 15 might be assistant superintendents. Other
 16 districts, they might have different title. At
 17 Lyons Township High School 204 they are directors,
 18 and so I have a director of curriculum and
 19 instruction, a director of human resources, a
 20 director of business services, a director of
 21 technology, and also our principal is part of that
 22 leadership team as well.
 23 Q. What's the difference between you and the
 24 principal?

Page 20

1 A. Simply -- I'll try to make it simple.
 2 Q. Okay.
 3 A. I view the principal as our immediate
 4 contact point with students. With our teachers.
 5 With the day-to-day functioning of the buildings.
 6 They are usually the first point of contact for --
 7 well, not actually not the first point. Usually
 8 before community members will contact me about
 9 school related items they'll go through the
 10 principal.
 11 The principal does not really deliver board
 12 reports. The principal is not -- does not have a
 13 committee that they oversee, whereas I view myself
 14 as overseeing all the committees, but each of the
 15 respective director reports that I have, have their
 16 own board committees.
 17 Q. Are you a member of the Board of Education?
 18 A. I am not.
 19 Q. I guess -- is the superintendent a member
 20 of the board?
 21 A. No.
 22 Q. Do you attend board meetings?
 23 A. Yes.
 24 Q. Excusing there might be an exception for

Page 21

1 one reason or another, do you attend every board
 2 meeting?
 3 A. To this point I have.
 4 Q. Fair enough. So, for the last seven or
 5 eight years you've attended every board meeting?
 6 A. Yes.
 7 Q. One of the directors you mentioned was
 8 director of business services. Is that a -- is that
 9 a person -- they are not elected, correct? They are
 10 a salaried employee?
 11 A. They are a salaried employee, correct.
 12 Q. Okay. And who hires the director of
 13 business services?
 14 A. Well, I go by the one that's been hired
 15 since I've been in the office, or in a position.
 16 That has been done through a committee which
 17 involved board members. I don't -- I don't hire
 18 individuals. Boards of Education hire and
 19 terminate. But they are usually through the
 20 recommendation of the superintendent. And so
 21 someone at that level would come with my
 22 recommendation if it were someone I was recommending
 23 to the Board of Education.
 24 Q. Does the Board of Education follow Robert's

<p style="text-align: right;">Page 22</p> <p>1 Rules of Order?</p> <p>2 A. Yes.</p> <p>3 Q. Are there any exceptions to that?</p> <p>4 A. That's pretty broad question. During the</p> <p>5 time of this dispute I -- I can't say either yes or</p> <p>6 no to that.</p> <p>7 Q. Okay.</p> <p>8 A. I would say no. But not being there</p> <p>9 before, you know, in a position prior to 2009, I</p> <p>10 would assume, yes.</p> <p>11 Q. Okay. Well, as the representative of 204,</p> <p>12 is that your -- I don't want you to guess, but is</p> <p>13 that an educated answer?</p> <p>14 A. I would say that we follow Robert's Rules</p> <p>15 of Order. To answer your question about have</p> <p>16 there been any -- I don't recall your exact</p> <p>17 question. I would speculate no. There hasn't been</p> <p>18 a deviation from that.</p> <p>19 Q. You mentioned, I believe, that the Board of</p> <p>20 Education has committees, correct?</p> <p>21 A. Yes.</p> <p>22 Q. One of those is the finance committee, I</p> <p>23 believe. Is that accurate?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 working meetings where things are flushed out. You</p> <p>2 work with the committee and things that make it</p> <p>3 through the committee go to the full board for</p> <p>4 recommendation.</p> <p>5 Q. Okay. So, is it fair to say that</p> <p>6 committees cannot themselves take final action but</p> <p>7 can only make recommendations to the Board of</p> <p>8 Education?</p> <p>9 A. I would say that's fair.</p> <p>10 Q. To your knowledge, does the finance</p> <p>11 committee have any authority to enter into a</p> <p>12 contract?</p> <p>13 A. Can you be a little more specific on that</p> <p>14 in terms of enter into? Are you talking about</p> <p>15 negotiating?</p> <p>16 Q. Can the finance committee or an individual</p> <p>17 member of the finance committee agree to a contract</p> <p>18 on behalf of LT?</p> <p>19 A. No.</p> <p>20 Q. That can only be done by a vote of the</p> <p>21 board, correct?</p> <p>22 A. When you say an individual person --</p> <p>23 Q. One of the committee members.</p> <p>24 A. Committee members will bring -- committee</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. How many committees are there, ballpark?</p> <p>2 A. Let me guess five. Do you want me to name</p> <p>3 them for you.</p> <p>4 Q. If you can, sure.</p> <p>5 A. Curriculum, HR, technology, facilities,</p> <p>6 finance, policy, and when necessary, a litigation</p> <p>7 committee.</p> <p>8 Q. I won't ask you about that one. Are you a</p> <p>9 member of any of those committees?</p> <p>10 A. I would say by my position, I don't know if</p> <p>11 I would say I'm a member. I attend all of the</p> <p>12 meetings.</p> <p>13 Q. Do you attend all of the finance committee</p> <p>14 meetings?</p> <p>15 A. Yes.</p> <p>16 Q. Do you have a vote on the finance</p> <p>17 committee?</p> <p>18 A. No.</p> <p>19 Q. Who has votes on the committee?</p> <p>20 A. Committees aren't necessarily votes.</p> <p>21 Q. Okay.</p> <p>22 A. Committees bring things through to the</p> <p>23 regular board for the business operations of the</p> <p>24 business meetings. The committee meetings are</p>	<p style="text-align: right;">Page 25</p> <p>1 will bring something through to the full board. The</p> <p>2 committee will work with the formulation of</p> <p>3 agreements. The committee may work to communicate</p> <p>4 concerns from the board level, representing the</p> <p>5 board's voice, but when it comes down to the</p> <p>6 approval, the full board.</p> <p>7 Q. Do all contracts have to be approved by the</p> <p>8 board?</p> <p>9 A. As the board's agent I have authority to</p> <p>10 approve certain contracts.</p> <p>11 Q. Ballpark, what kind of contracts are those?</p> <p>12 A. I have approved graduation, caps and gowns.</p> <p>13 Our business director at the designation of me has</p> <p>14 been able to work with soft drink companies. Those</p> <p>15 are brought to the board, but at the end they are</p> <p>16 signed off on by the respective individual in the</p> <p>17 position of which it would answer to. So, our</p> <p>18 business director, director of business services,</p> <p>19 does have authority to negotiate and work with our</p> <p>20 district counsel on the formulation, but no</p> <p>21 contracts are brought forward without the knowledge</p> <p>22 of the Board of Education.</p> <p>23 Q. Is there -- you gave a contract relating to</p> <p>24 soft drink services, or I believe it was graduation</p>

Page 26

1 activities. Is there a differentiating -- is there
 2 a text I can look at to see what contracts, you
 3 know, you or the director of business services would
 4 be authorized to enter into and what contracts the
 5 board would need to enter into? Like a dollar value
 6 or something like that?
 7 A. There wouldn't be anything like that that
 8 would exist to my knowledge.
 9 Q. If the board authorized you to enter into a
 10 contract binding LT, would that be reflected in the
 11 meeting minutes?
 12 A. I'm not following your question.
 13 Q. Okay. As I understand your answer, in some
 14 instances the board can authorize an individual to
 15 enter into a contract on behalf of the board; is
 16 that correct?
 17 A. There are certain things, yes.
 18 Q. Certain --
 19 A. As the board's agent, you do have that,
 20 some autonomy to be able to go on out as the voice
 21 and representation for your board, and that's not
 22 unique to District 204.
 23 Q. If a contract is signed, who signs it?
 24 A. That would depend. For example, we have

Page 27

1 software contracts where our director of technology
 2 has signed-off on the contract after receiving the
 3 approval and with the knowledge of the Board of
 4 Education.
 5 Q. That approval in that example, would that
 6 be documented in the meeting minutes of the board?
 7 A. The contract would.
 8 Q. The board's approval of the contract would?
 9 A. I'm trying to think of all -- I would
 10 think, yes, the board's approval of the contract
 11 through action.
 12 Q. Is it fair to say that all contracts have
 13 to be approved or authorized by the board?
 14 A. I -- I can't say that. I -- I can't say
 15 yes to that. Contracts come in many different
 16 forms. They are pretty broad.
 17 MR. KALTENBACH: Let's mark this as Exhibit
 18 2.
 19 (Exhibit Number 2 was marked.)
 20 BY MR. KALTENBACH:
 21 Q. Sir, I'm going to hand you Exhibit 2, which
 22 is an excerpt from an LT policy manual that we
 23 obtained.
 24 A. Uh-huh.

Page 28

1 Q. I don't remember if your attorneys gave
 2 this to us or if this is something we pulled off the
 3 Internet. It's Section 4:60 entitled Operational
 4 Services. And I don't want you to be misled as to
 5 dates. If you turn to the second page, you'll see
 6 it says, adopted January 21st of 2014.
 7 So, I know this wasn't, at least this
 8 particular document was not necessarily the same as
 9 what would have been, you know, during the '90s and
 10 the 2000s. But this document states under the
 11 heading, Standards For Purchasing and Contracting,
 12 quote: All purchases and contracts shall be entered
 13 into accordance with state law. The board attorney
 14 shall be consulted as needed requiring the legal
 15 requirements for purchases or contracts. All
 16 contracts shall be approved or authorized by the
 17 board. Close quote.
 18 Was this policy substantially the same as
 19 the one that was in effect during the '90s and the
 20 2000s?
 21 A. I don't have that policy in front of me
 22 so I --
 23 Q. I can't -- we don't have the equivalent of
 24 this from the '90s and 2000s. There isn't a similar

Page 29

1 version that I can't find either in what was
 2 produced to us. Is this currently policy correct to
 3 your understanding?
 4 A. To my understanding, yes.
 5 Q. So, currently all contracts shall be
 6 approved or authorized by the board, correct?
 7 A. Correct.
 8 Q. But what you're saying is you don't know if
 9 that's true in the '90s and the 2000s?
 10 A. I wasn't there.
 11 Q. You understand, however, you are testifying
 12 as a representative?
 13 A. I do. And I can't -- I can only speculate.
 14 I wish I could give you a better answer.
 15 Q. I don't want you to guess. An educated --
 16 it's one thing to give an educated answer, but I
 17 don't want you to guess, though.
 18 You're aware of the contract that LT
 19 alleges to be in existence in this case regarding
 20 its getting a credit for the pro rata of the
 21 treasurer's expenses, correct, sir?
 22 MR. HOFFMAN: Object to the form of the
 23 question, the mischaracterization of our position in
 24 your question.

<p style="text-align: right;">Page 30</p> <p>1 BY MR. KALTENBACH:</p> <p>2 Q. You can answer.</p> <p>3 A. I'm aware of the agreement.</p> <p>4 Q. Fair enough. 204 contends that that's a</p> <p>5 contract, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Was that contract something that the Board</p> <p>8 of Education needed to enter into?</p> <p>9 A. I believe they did.</p> <p>10 Q. Is that something -- well, you're saying</p> <p>11 you believe they did and then they did enter into</p> <p>12 it, correct?</p> <p>13 A. Yes.</p> <p>14 Q. I'm asking you, is that the type of</p> <p>15 contract, let's say in the '90s or in the 2000s,</p> <p>16 that the board itself had to enter into, as opposed</p> <p>17 to designating someone?</p> <p>18 MR. HOFFMAN: When you say enter into, are</p> <p>19 you meaning the same thing as approved or</p> <p>20 authorized, or something different?</p> <p>21 BY MR. KALTENBACH:</p> <p>22 Q. Okay. Fair enough. Let me withdraw that</p> <p>23 question.</p> <p>24 Is the contract relating to the payment of</p>	<p style="text-align: right;">Page 32</p> <p>1 that needed to be approved or authorized by the</p> <p>2 Board of Education?</p> <p>3 A. Can you ask that again? Your guys' dialog</p> <p>4 back and forth, I want to make sure I'm answering</p> <p>5 the question that you're asking.</p> <p>6 Q. The contract relating to the pro rata</p> <p>7 expenses, you understand what contract I'm referring</p> <p>8 to, right?</p> <p>9 A. Well, the pro rata expenses are billed to</p> <p>10 every district.</p> <p>11 Q. Okay. But I think we all -- I'm not trying</p> <p>12 to be coy here, sir. There is a contract at issue</p> <p>13 in this particular lawsuit, correct?</p> <p>14 A. Correct.</p> <p>15 Q. Between 204 and the Township Trustees.</p> <p>16 You understand that, correct?</p> <p>17 A. I do.</p> <p>18 Q. Is that contract a contract that needed to</p> <p>19 be approved or authorized by the Board of Education</p> <p>20 of LT?</p> <p>21 A. If we're talking about the contract for</p> <p>22 business services --</p> <p>23 Q. Yes.</p> <p>24 A. -- okay, not the pro rata. Because</p>
<p style="text-align: right;">Page 31</p> <p>1 pro rata expenses the type of contract that in the</p> <p>2 '90s and the 2000s the Board of Education had to</p> <p>3 approve or authorize?</p> <p>4 MR. HOFFMAN: Okay. Hold on a second.</p> <p>5 It's not a contract for the payment of pro rata</p> <p>6 expenses. It's a contract for the payment of LT's</p> <p>7 business, the cost of LT's business functions.</p> <p>8 MR. KALTENBACH: I don't think the witness</p> <p>9 is confused by what I'm asking.</p> <p>10 MR. HOFFMAN: Well, I think there is a</p> <p>11 fundamental problem with your question because the</p> <p>12 question of the pro rata expenses of the TTO is</p> <p>13 separate from the agreement on the cost of paying</p> <p>14 for LT's business functions, and your question is</p> <p>15 melding the two concepts, and that's why I'm having</p> <p>16 a problem with it.</p> <p>17 MR. KALTENBACH: Okay. So your objection</p> <p>18 is what?</p> <p>19 MR. HOFFMAN: Objection is the question is</p> <p>20 vague, misleading, and mischaracterizes the witness'</p> <p>21 testimony and LT's positions as articulated in the</p> <p>22 pleadings of this case.</p> <p>23 BY MR. KALTENBACH:</p> <p>24 Q. Sir, is the contract the type of contract</p>	<p style="text-align: right;">Page 33</p> <p>1 pro rata is what all districts receive, pro rata</p> <p>2 billing. The agreement that we had would need to go</p> <p>3 to our board, which it did.</p> <p>4 Q. And you say, go to the board, you mean for</p> <p>5 approval or authorization, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Who signs -- sorry. Who executes documents</p> <p>8 on behalf of the board?</p> <p>9 A. You mean any sort of document, any sort</p> <p>10 of -- which documents do you refer to?</p> <p>11 Q. I'm not a hundred percent sure.</p> <p>12 Why don't we mark this as Exhibit 3.</p> <p>13 (Exhibit Number 3 was marked.)</p> <p>14 BY MR. KALTENBACH:</p> <p>15 Q. Sir, you've been handed Exhibit 3, which is</p> <p>16 a page of the 204 policy manual. It says it was</p> <p>17 adopted July 18 of 1988. It's Section 1.09.01. The</p> <p>18 heading is: School Board Operations Duties of the</p> <p>19 President. And it states, second sentence: The</p> <p>20 president shall execute all documents on behalf of</p> <p>21 the board, except as otherwise provided by law or by</p> <p>22 special action of the board.</p> <p>23 Do you know what documents this is</p> <p>24 referring to?</p>

Page 34

1 A. Well, I don't know if this was the -- if
 2 this was the actual policy that was in place during
 3 the time of the -- I believe 1990-2012, I believe.
 4 I don't know if this was in place, if this was
 5 actually what was sitting there.
 6 Q. To my knowledge it is, because I'm not
 7 aware of anything else that came into being
 8 addressing this topic, at least prior to 2014. So,
 9 assuming that there is not another policy that is
 10 out there, because if there is it hasn't been given
 11 to us, that is to say, a successor to Section
 12 1.09.01, what documents is this referring to?
 13 A. I would assume -- I'm going to use my
 14 current lens. Financial documents, anything with
 15 board expenditures. It would be possibly hiring of
 16 staff, which is related to that as well.
 17 Q. Would this include contracts?
 18 A. Again, I want to make certain that I'm
 19 giving you a right answer. That's a broad question.
 20 You're saying every single contract. I don't know
 21 if I would -- I would agree with that.
 22 Q. What kinds of contracts would the president
 23 not execute?
 24 A. Well, sometimes there are situations with

Page 35

1 maybe special education students, that sometimes
 2 there is a -- through due process that there might
 3 be an agreement between counsel as to -- to settle
 4 any dispute. I have that authority that I would
 5 sign on. It's very confidential. It's not things
 6 that are shared with an open board meeting. So,
 7 there are certain documentation -- separation
 8 agreements with employees. That's something that I
 9 would have.
 10 So, there are some things that are of a
 11 confidential nature. So, to blanketly state I think
 12 this would refer to all board documents, and that
 13 would be correct.
 14 Q. Is a contract with LT a board document?
 15 A. As I said, I just told you some examples
 16 that are contracts that may not go to our board
 17 president for execution. They would go to their
 18 agent, the board's agent, which is the
 19 superintendent.
 20 Q. The contract regarding business services,
 21 we'll just call it that so you understand to what
 22 we're referring. Is that fair enough?
 23 A. Fair enough.
 24 Q. Okay. The contract for business services,

Page 36

1 did that need to be executed by the president on
 2 behalf of the board?
 3 A. Many times. There are also board agents,
 4 and in this case I can see how this could also be
 5 the board agent as the director of business
 6 services, as someone who is saying, you have our
 7 authority to go and do this. So, I would say that
 8 it would depend upon the agreement, and it would
 9 depend upon any discussion that may have happened
 10 between the board, the board president and our
 11 staff.
 12 Q. Well, this policy that we're looking at,
 13 Section 1.09.01, says: The president shall sign
 14 except as otherwise provided by law or by special
 15 action of the board. So, it seems to contemplate
 16 the board can take special action --
 17 A. Right.
 18 Q. -- to excuse the president executing a
 19 document. So, is that what you're referring to when
 20 you say perhaps a business manager could execute a
 21 document?
 22 MR. HOFFMAN: Object to the question as
 23 disjointed and vague and contrary to the witness'
 24 testimony.

Page 37

1 BY MR. KALTENBACH:
 2 Q. You can answer, sir.
 3 A. Again, you're going to have ask that
 4 question again.
 5 Q. Okay. When you're saying that perhaps a
 6 business manager could -- or director of business
 7 services could be authorized to sign a document, is
 8 that because the policy says that special action of
 9 the board can be taken to prevent someone other than
 10 the president to execute a document?
 11 MR. HOFFMAN: Object to the form of the
 12 question. Misstates the witness' prior testimony.
 13 THE WITNESS: I mean I've given you the
 14 answer. I don't know -- I'm not following what the
 15 question is. I'm really not.
 16 BY MR. KALTENBACH:
 17 Q. Did Lisa Beckwith have -- did the board
 18 take special action to authorize Lisa Beckwith to
 19 execute a document relating to the contract for
 20 business services?
 21 A. In reading the minutes, it became pretty
 22 clear to me that there was a directive that she
 23 should work with the treasurer and the treasurer's
 24 office to address some of the concerns that were

<p style="text-align: right;">Page 38</p> <p>1 expressed from the LT Board of Education about</p> <p>2 paying very high costs for little or no service.</p> <p>3 And I read that in the minutes that she was given</p> <p>4 that authority.</p> <p>5 Q. Whose minutes?</p> <p>6 A. That would be our finance committee meeting</p> <p>7 minutes.</p> <p>8 Q. Did the Board of Education authorize Lisa</p> <p>9 Beckwith to enter into a contract, the business</p> <p>10 services contract with the TTO?</p> <p>11 A. My reading of that document is that they</p> <p>12 authorized her to work with that office and come</p> <p>13 back with a workable document that the board could</p> <p>14 act on.</p> <p>15 Q. Okay. Lisa Beckwith was not authorized to</p> <p>16 contract on behalf of the board, was she?</p> <p>17 A. Lisa Beckwith was authorized to formulate,</p> <p>18 and she was authorized to work with the treasurer's</p> <p>19 office to come and address the concerns, and I think</p> <p>20 the documents that I've seen made it pretty clear</p> <p>21 that there was a working relationship back and forth</p> <p>22 to address what the Board of Education, the</p> <p>23 directive that she was given. And the final product</p> <p>24 was brought back to the Board of Education which</p>	<p style="text-align: right;">Page 40</p> <p>1 We've talked about a contract for the</p> <p>2 business services, correct, sir?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Is there a signed contract</p> <p>5 somewhere?</p> <p>6 A. I believe there is.</p> <p>7 Q. What is the signed contract?</p> <p>8 A. It is a document that comes every June, and</p> <p>9 it's the memo along with the support documentation</p> <p>10 that shows for the charge-back of the setoff</p> <p>11 agreement for business services.</p> <p>12 Q. You say the memo that comes every June. To</p> <p>13 whom is it coming and to whom is it going?</p> <p>14 A. It goes from Lisa Beckwith or the director</p> <p>15 of business services in a broader sense. In the</p> <p>16 years of this dispute it came from the business</p> <p>17 office. It went to the Board of Education with</p> <p>18 support documentation, and the Board of Education</p> <p>19 acted on that every year on that document.</p> <p>20 Q. And that's the contract for business</p> <p>21 services?</p> <p>22 A. That's the agreement that was put into</p> <p>23 place in 1999.</p> <p>24 Q. Is there --</p>
<p style="text-align: right;">Page 39</p> <p>1 they approved.</p> <p>2 Q. And Lisa Beckwith did not have authority to</p> <p>3 approve that final product herself, did she?</p> <p>4 A. Alone?</p> <p>5 Q. Yes.</p> <p>6 A. No.</p> <p>7 Q. And the finance committee did not have</p> <p>8 authority to approve that final product alone, did</p> <p>9 it?</p> <p>10 A. Members of the finance committee did</p> <p>11 approve it as board members when it came to them</p> <p>12 every June.</p> <p>13 Q. The finance committee itself did not</p> <p>14 approve it?</p> <p>15 A. The finance committee formulated the</p> <p>16 agreement, again, working with our business</p> <p>17 director, director of business services,</p> <p>18 communicated what the issues and concerns were, and</p> <p>19 the finance committee was pleased with what was</p> <p>20 given to them, and it was sent to the full Board of</p> <p>21 Education for their approval.</p> <p>22 Q. Is there a written agreement for the</p> <p>23 business services -- strike that. Let me withdraw</p> <p>24 that.</p>	<p style="text-align: right;">Page 41</p> <p>1 A. And approved in 2000.</p> <p>2 Q. I don't want to mix around parsing words.</p> <p>3 I asked you if that's the contract and you said</p> <p>4 that's the agreement. Is there a difference in your</p> <p>5 mind between the contract and agreement? Is there a</p> <p>6 distinction you're using?</p> <p>7 A. You're asking me a legal question. I'm not</p> <p>8 going to get into a banter with a lawyer about</p> <p>9 contracts versus agreements.</p> <p>10 Q. I won't get into banter about history with</p> <p>11 you.</p> <p>12 A. You probably could. It's been a while.</p> <p>13 The contract or agreement I believe was in</p> <p>14 writing. I believe the spirit of it came every</p> <p>15 year. I believe the Board of Education acted in</p> <p>16 open session in good faith on what was presented to</p> <p>17 them by the agent of the treasurer's office, which</p> <p>18 is their treasurer, and I believe that that</p> <p>19 agreement -- we've shared those documents -- that</p> <p>20 would be the agreement or contract.</p> <p>21 Q. Okay. You said, you referenced the</p> <p>22 agreement coming from Lisa Beckwith or the director</p> <p>23 of business services as the case may be because this</p> <p>24 was a document generated?</p>

Page 42

1 A. There were three of them, I believe, during
 2 the span. Three director of business services.
 3 Q. So Lisa Beckwith, David Sellers, and Harold
 4 Huang?
 5 A. Huang. Yes.
 6 Q. So, that's a document that the director of
 7 business services creates, right?
 8 A. Yes.
 9 Q. And that document then gets sent to the
 10 Board of Education each year, correct?
 11 A. I would have to see the document, but
 12 generally speaking, yes. I would want to see if
 13 you're referring to something different.
 14 Q. Okay. We'll look at that. Is there a
 15 document that comes from the TTO then?
 16 A. Yes. The pro rata bill.
 17 Q. Okay. And so the pro rata bill and the
 18 memorandum prepared by the director of business
 19 services, that's the agreement?
 20 A. The pro rata --
 21 MR. HOFFMAN: Object to the form of the
 22 question.
 23 BY MR. KALTENBACH:
 24 Q. Is that correct, sir?

Page 43

1 A. Say that again, please.
 2 Q. What constitutes the agreement?
 3 MR. HOFFMAN: Objection. Asked and
 4 answered.
 5 THE WITNESS: The agreement is the exactly
 6 what I've said earlier. I mean the agreement/
 7 contract of what you're saying. I've said it three
 8 different ways. I don't know what else I can say
 9 about the agreement that's going to change.
 10 (Mr. Kubasiak left the deposition room.)
 11 BY MR. KALTENBACH:
 12 Q. How are bills paid by District 204? What's
 13 the procedure for approving a bill?
 14 A. It comes to the business office. Business
 15 office with a requisition and check. In this case
 16 we print our own checks. Accounts payable. And
 17 then we bring it over to the township treasurer's
 18 office for approval. Those expenditures are
 19 approved by our Board of Education in the monthly
 20 expense reports, which is what most elected boards
 21 do. In the case of -- there might be some odd cases
 22 that that doesn't happen.
 23 Q. Sure.
 24 A. But yes.

Page 44

1 Q. Okay. Was that procedure, generally
 2 speaking, the same in the '90s and 2000s and now?
 3 A. I would say it would be the same.
 4 Q. Okay. What is the -- what, in terms of
 5 school board operations, what is the consent agenda?
 6 A. Well, there are certain things that we're
 7 allowed as Boards of Education to have on their
 8 consent agenda. We do -- we are the fiscal agent of
 9 LADSE, so LADSE expenditures are approved through
 10 our consent agenda, with all support contained in
 11 the packets.
 12 We do our own personnel report through the
 13 consent agenda. We do student trips through our
 14 consent agenda. If we have a donation from a
 15 community member, we will approve that through the
 16 consent agenda. Usually that is done to try to
 17 curtail or to keep a lot of the business items that
 18 are routine and come every month or every time
 19 during the year, like if it's one-time of year every
 20 year it comes. That's what it's used for. And it's
 21 usually, it's at the end -- at our meetings it's on
 22 the last part of our agenda. There have been
 23 episodes where we very pulled things from the
 24 consent agenda before. It's rare. And then the

Page 45

1 board votes on the consent agenda. Individual voice
 2 vote. Some places call it an omnibus. It's the
 3 same concept.
 4 Q. They are approved kind of en masse, is that
 5 correct?
 6 A. Yes.
 7 Q. If it's on the consent agenda?
 8 A. Yes.
 9 Q. The payment of the pro rata to the township
 10 treasurer each year to the extent a payment is made,
 11 is that approved through the consent agenda?
 12 A. It has been, yes.
 13 Q. Is that appropriate in your view as you've
 14 described the consent agenda?
 15 A. Yes.
 16 Q. Because that's a bill that comes due once a
 17 year for payment?
 18 A. It's appropriate. It is -- it's something
 19 that can be discussed. Usually it's discussed
 20 beforehand. Most consent agenda items are.
 21 Q. Discussed beforehand in the board meeting
 22 or prior to the board meeting?
 23 A. Prior. Usually committees.
 24 MR. KALTENBACH: Let's mark this as Exhibit

<p style="text-align: right;">Page 46</p> <p>1 Number 4. 2 (Exhibit Number 4 was marked 3 for identification.) 4 BY MR. KALTENBACH: 5 Q. There you go, Dr. Kilrea. Sir, I've handed 6 you Exhibit Number 4, which is again part of the 204 7 policy manual. It's Section 1.11.4, which consists 8 of three pages. You'll see at the bottom it says it 9 was adopted -- bottom of the first page -- adopted 10 in '91, revised in '92, revised again in '95. 11 It's entitled School Board Operations Order 12 of Business, and it states: The order of business 13 at regular meetings of the Board of Education will 14 generally be as follows. And then there is 13 Roman 15 numerals, and you'll see the Roman numeral nine is 16 the consent agenda, correct? 17 A. Yes. 18 Q. And Roman numeral eight is new business, 19 correct? 20 A. Yes. 21 Q. Okay. Is this the order of business that 22 governed Board of Education meetings in the '90s and 23 2000s? 24 A. It's rare -- I've not seen two closed</p>	<p style="text-align: right;">Page 48</p> <p>1 MR. HOFFMAN: True. 2 BY MR. KALTENBACH: 3 Q. Fair enough. You were saying you have not 4 seen closed sessions, I believe. 5 A. Two. 6 Q. You've seen two? 7 A. No. I've not -- I'm looking at this. 8 Q. Okay. Item 2? 9 A. And Item 11. 10 Q. Yes. 11 A. So, things like that are a little rare. 12 Also, other items is not something that I have seen 13 either. That's a little broad. Students' staff 14 recognition is not always on a board agenda. 15 Sometimes it is. Sometimes it's not. It's usually 16 done in the superintendent's report. 17 Q. Okay. 18 A. Communications and public participation is 19 a standing item. We have to do that. So, perhaps 20 back in the '90s and prior the board used to have 21 two closed sessions, but I don't believe -- or I can 22 tell you that is not the case now. 23 Q. You'll see on page -- the bottom of Page 2, 24 there is kind of an elaboration on Roman numeral</p>
<p style="text-align: right;">Page 47</p> <p>1 sessions on a board meeting since my time in the 2 district. And even my time as not a superintendent, 3 seeing two closed sessions -- 4 MR. HOFFMAN: Just a second. Let the 5 record reflect -- 6 THE WITNESS: Sorry. 7 MR. KALTENBACH: I actually have an extra 8 one. I have an extra one if you want to make notes 9 on it. 10 MR. HOFFMAN: Just so -- 11 THE WITNESS: I'm sorry. 12 MR. HOFFMAN: For the purpose of the 13 record, we just need to tell Dr. Kilrea that he's 14 not allowed to write on the -- let's just go off the 15 record. 16 (There was a discussion 17 held off the record.) 18 BY MR. KALTENBACH: 19 Q. Just for the record, Dr. Kilrea, please 20 refrain -- we're kind of laughing as we're saying 21 it. Just refrain from marking the document because 22 then it becomes a question as to who marked it. 23 The record, Jay, can reflect the witness 24 put some immaterial markings on prior exhibits?</p>	<p style="text-align: right;">Page 49</p> <p>1 eight, New Business. It says: New business is any 2 matter that is deemed presented to the Board for the 3 first time. This section could include items for 4 action, information, and/or discussion. Do you see 5 that language, sir? 6 A. Yes. 7 Q. The Board is a reference to the Board of 8 Education, right? 9 A. Yes. 10 Q. So, if a matter is being presented to the 11 Board for the first time it should go on the new 12 business, not on the consent agenda; is that 13 correct? 14 MR. HOFFMAN: Object to the form of the 15 question. You can answer. 16 THE WITNESS: Not always. Because 17 sometimes there is discussions. Sometimes there is 18 a long line of communications that have taken place 19 about items that it may appear to be a new business 20 item because it's appearing on the agenda for the 21 first time, but if something has been discussed for 22 months and there have been communications from the 23 superintendent updates to the Board of Education, it 24 may not be a new item.</p>

<p style="text-align: right;">Page 50-</p> <p>1 So, I don't think that's the case for</p> <p>2 everything because there are things that we talk</p> <p>3 about as a board regularly. Sometimes it might be</p> <p>4 an closed session item. Sometimes it might be just</p> <p>5 through updates through committees that the board is</p> <p>6 aware of. So, I would say that that's not always</p> <p>7 the case based on the examples I've given you.</p> <p>8 BY MR. KALTENBACH:</p> <p>9 Q. Okay. How about a contract? If a contract</p> <p>10 is being approved or authorized by the board, would</p> <p>11 it ever be appropriate for that to be on a consent</p> <p>12 agenda for the first time?</p> <p>13 A. Yes.</p> <p>14 Q. And that, would that be under the</p> <p>15 circumstances you just described?</p> <p>16 A. We do contracts, we do employee contracts</p> <p>17 on a consent agenda. That's 76 percent of our</p> <p>18 revenues annually, and those are not brought in as</p> <p>19 new business. These are personnel reports that are</p> <p>20 given with the salary, and that's a consent agenda</p> <p>21 item, and those are some pretty major expenses.</p> <p>22 Q. I want to talk a little bit about the --</p> <p>23 we're not going to -- you can keep it in front of</p> <p>24 you.</p>	<p style="text-align: right;">Page 52</p> <p>1 The terms of the agreement were that,</p> <p>2 actually the beginning of the agreement was that LT</p> <p>3 was paying full pro rata share and not getting the</p> <p>4 same services that every other member district was</p> <p>5 getting, and when the bills got very high, our board</p> <p>6 said, is there something we can do because this --</p> <p>7 this does not appear to be correct. And that really</p> <p>8 launched the discussions.</p> <p>9 Where they ended was the cost of accounts</p> <p>10 payable, payable, computer services, reconciliation,</p> <p>11 check printing. Those were some general parameters,</p> <p>12 again, that the TTO agreed that if they were</p> <p>13 performing those services for 204, that they would</p> <p>14 have to charge the members higher pro rata fees.</p> <p>15 Q. So, what was the agreement? What did each</p> <p>16 side agree to do?</p> <p>17 A. We agreed that -- or the TTO agreed to pay</p> <p>18 for the business services that we were performing</p> <p>19 ourselves, that they were performing, the TTO was</p> <p>20 performing, for every other member district. And</p> <p>21 those were the things that I just outlined to you as</p> <p>22 to what those business services were.</p> <p>23 Q. Was it paying the salaries of specific</p> <p>24 individuals?</p>
<p style="text-align: right;">Page 51</p> <p>1 A. I'm not going to write anymore.</p> <p>2 Q. I want to let you know I'm moving on.</p> <p>3 A. Again I do apologize for writing on it.</p> <p>4 Q. It's not a big deal.</p> <p>5 MR. HOFFMAN: Minor.</p> <p>6 BY MR. KALTENBACH:</p> <p>7 Q. It's honestly that not that big of a deal.</p> <p>8 A. Scolded as Jay grabbed my pen from me.</p> <p>9 Q. These things happened. I've had witnesses</p> <p>10 doodle on documents.</p> <p>11 Sir, you testified regarding I think what</p> <p>12 we just said, we'll go ahead and call the contract</p> <p>13 for the business services?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. What were the terms of that</p> <p>16 contract?</p> <p>17 A. Of the TTO offset for our business</p> <p>18 services?</p> <p>19 Q. Yes. The contract that's being alleged in</p> <p>20 the new pleading.</p> <p>21 A. It started in 1999. Discussions -- a lot</p> <p>22 of discussions took place involving the trustees,</p> <p>23 involving the LT board, through their agents, the</p> <p>24 treasurer and the director of business services.</p>	<p style="text-align: right;">Page 53</p> <p>1 A. The agreements outlined by position.</p> <p>2 Q. So, it was by position, certain positions</p> <p>3 were going to be paid?</p> <p>4 A. Yeah, because there were different people</p> <p>5 over time. So, if it was just with an individual</p> <p>6 name, if that changes, that was by position.</p> <p>7 Q. Was it is whatever the salary of that</p> <p>8 position happened to be as determined by 204?</p> <p>9 A. I would say yes.</p> <p>10 Q. You mentioned 204 was providing services</p> <p>11 that other districts were receiving from the</p> <p>12 treasurer's office. Is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. Is it 204's position that, for instance, no</p> <p>15 other district had accounts payable personnel?</p> <p>16 A. Our position is that we have an accounts</p> <p>17 payable person, and they may have -- if other</p> <p>18 districts did have that, I'm not aware of that, but</p> <p>19 perhaps that person was in place as a checks and</p> <p>20 balance system. We were actually performing the</p> <p>21 duties in-house.</p> <p>22 Q. And the same answer would go to payroll,</p> <p>23 for instance, and computers?</p> <p>24 A. Yes.</p>

<p style="text-align: right;">Page 54</p> <p>1 Q. So, if other districts also had people 2 doing payroll and computer systems, why would 204 3 get payment for that but the other districts would 4 not? Can you explain that to me? 5 MR. HOFFMAN: Object to the question as 6 assuming facts that are not in evidence and asking 7 the witness to respond to a hypothetical and 8 speculate. With that, you can answer the question 9 as best you can. 10 THE WITNESS: I can't. I can't speculate. 11 I don't know what the formation was of the business 12 offices, just like I can't -- I can't speculate on 13 any of that. 14 BY MR. KALTENBACH: 15 Q. How long was this contract relating to the 16 payment of business services, what was the duration 17 of it? 18 A. My understanding, the duration was until 19 either party decided that it was no longer in place. 20 Q. You said that that's your understanding, so 21 I guess that's one of those instances where -- 22 A. No. The organization's understanding is 23 that absolutely this was in place until it was 24 decided that either side, either party did not want</p>	<p style="text-align: right;">Page 56</p> <p>1 MR. KALTENBACH: Yes. 2 MR. HOFFMAN: I've got it. 3 MR. KALTENBACH: So, that's what I meant 4 when I said two documents. 5 BY MR. KALTENBACH: 6 Q. This looks to be, sir, a three-page agenda 7 for a Board of Education meeting from June 19th of 8 2000, and then I don't think it's the entire packet 9 of minutes because I think some exhibits that are 10 not at issue may have been removed when they were 11 provided to us, which I don't think we take issue 12 with. But in any event, are you familiar with those 13 two documents? 14 MR. HOFFMAN: Just for the record, Barry, 15 the last page does not belong on this document. 16 MR. KALTENBACH: That came up in a previous 17 deposition. 18 MR. HOFFMAN: Right. We scoped that out. 19 You can see that it post dates -- 20 MR. KALTENBACH: Yes. 21 MR. HOFFMAN: -- the okay to pay. So the 22 last page, should we just remove that? What do you 23 want to do with that? It's not part of the meeting 24 minutes.</p>
<p style="text-align: right;">Page 55</p> <p>1 to continue, which happened in 2013. 2 Q. Was it something that had to be approved 3 every year by both parties? 4 A. As it involves expenditures, yes. 5 Q. And you testified earlier about the Board 6 of Education's approval, you know, I -- I don't have 7 the transcript in front of me. I'm not trying to 8 trick you. I'm trying to remember what you said. I 9 think you said -- I thought you said do you some of 10 these things in June. In any event, rather than me 11 trying to remember what you said, because Jay seems 12 to be better at remembering things during the course 13 of the dep than I am. This is two documents, but 14 we're going to mark it as Exhibit Number 5. 15 (Exhibit Number 5 was marked 16 for identification.) 17 MR. HOFFMAN: You said there were two 18 documents? 19 MR. KALTENBACH: Well, it was stapled as 20 two different documents. 21 MR. HOFFMAN: I see. 22 MR. KALTENBACH: They run consecutively. 23 MR. HOFFMAN: Agenda, and then the meeting 24 minutes?</p>	<p style="text-align: right;">Page 57</p> <p>1 MR. KALTENBACH: Let's leave it as the 2 exhibit because I don't want to tear a page off of 3 an exhibit, but I agree that we covered this at 4 someone's previous deposition, and it is actually 5 not part of these particular meeting minutes. I'm 6 not trying to trick you there either, Dr. Kilrea, so 7 you know you know that. 8 BY MR. KALTENBACH: 9 Q. So, subject to that discussion by counsel, 10 are you familiar with the agenda and the meeting 11 minutes of this particular meeting? 12 A. At some point I did review this. 13 Q. Is this -- is it 204's position that at 14 this meeting, this is when it authorized or approved 15 the contract for business services? 16 A. Yes. This was the first meeting where it 17 came into play. 18 Q. And looking -- we're going to have both of 19 these documents at once. If we look on the first 20 page of the agenda, there is -- it's Item 7. I 21 guess this time there is no closed session. There 22 we go. There is no closed session, so Item 7 is 23 consent agenda, and then sub-item P on the second 24 page says: Township treasurer's invoice. Do you</p>

Page 58

1 see that, sir?

2 A. Yes.

3 Q. Okay. And is it correct that the Board of

4 Education authorized payment of that invoice at this

5 meeting?

6 A. I want to look at the invoice itself to

7 make certain.

8 Q. Absolutely. And I guess -- when you find

9 the invoice let me know because I'll tell you, there

10 is an exhibit number and it's not Exhibit P. It's

11 Item P but it's not Exhibit P. So, if you turn to

12 Page 10 of the meeting minutes. They are numbered

13 up at the top left. You'll see that there is -- let

14 me know when you get to Page 10.

15 A. Where are they numbered?

16 Q. Upper left. So, when you get to Page 10,

17 you'll see that it says: Township treasurer's

18 invoice. And then it says Exhibit P, right? So if

19 you turn another --

20 A. Three pages?

21 Q. Yes. Three pages you'll see a memorandum

22 that has a T written on the upper right corner.

23 A. And this appears to be the same as the last

24 page at first flush that's in this.

Page 59

1 Q. It does, excepting for some handwriting and

2 a stamp and other things.

3 A. Yes.

4 Q. And we've agreed the last page was probably

5 inadvertently put in here because maybe we weren't

6 sure where it stopped.

7 In any event, is it 204's position that

8 by -- that on consent agenda it approved Exhibit T?

9 Or the payment of Exhibit T?

10 MR. HOFFMAN: Object to the form.

11 BY MR. KALTENBACH:

12 Q. Let me withdraw that question.

13 How about I just ask you, what did the

14 Board of Education do at this meeting with regard to

15 Exhibit T?

16 A. As part of the consent agenda it was voted

17 on. I can look through the minutes. But assuming

18 that it was approved and judging from this, they

19 were asked to approve a payment in the net amount of

20 \$59,073.

21 Q. Do the minutes show that it was approved?

22 A. I believe it does.

23 Q. Where are you looking at, sir?

24 A. Because it talks about the -- it says:

Page 60

1 Action approval consent agenda.

2 Q. Can you let me know what page you're at?

3 A. I'm sorry. It's Page 6. Action Number 8.

4 It says: The approval of consent agenda.

5 Q. Then it says Mr. Para moved, seconded by

6 doctor?

7 A. Polacek.

8 Q. P-o-l-a-c-e-k. To approve the consent

9 agenda as amended. Okay. It doesn't seem to

10 reflect that a vote was had on that. At least not

11 on the page we're looking at, which is Page 6?

12 A. Yeah. Let me find a voice votes because

13 they're there.

14 Q. Okay.

15 A. If you look to Page 10 on roll call, midway

16 down, ayes, it looks to me that one, two, three,

17 four, five, six, seven, board members --

18 Q. All seven members?

19 A. Seven-zero.

20 Q. Voted aye. So, this roll call vote, it's

21 not just for Exhibit 5 -- or sorry -- it's Exhibit

22 V, immediately above it, it's -- is it for all of

23 the items on the consent agenda?

24 A. Well, it says, as amended, so not having

Page 61

1 the amendment in front of me, like I spoke earlier,

2 sometimes some things could be taken off the consent

3 agenda. So, therefore it was amended at some point,

4 but this clearly was not an amended point of it, so

5 therefore, I read this as the board approved it,

6 seven-zero and that did involve the treasurer's

7 invoice.

8 Q. What, you said the board approved it. What

9 is the "it" --

10 A. The agreement.

11 Q. -- that was approved? The agreement

12 between LT and the TTO?

13 A. Correct.

14 Q. Regarding the payment of business services?

15 A. Yes.

16 Q. So, that agreement was approved on the

17 consent agenda? I want to make sure I understand

18 your position as the representative of 204.

19 A. Yes.

20 Q. So, the vote approving payment of the

21 invoice and the vote approving the contract are one,

22 one in the same vote?

23 A. Yes.

24 MR. HOFFMAN: Let's take a break.

<p style="text-align: right;">Page 62</p> <p>1 (Recess.)</p> <p>2 BY MR. KALTENBACH:</p> <p>3 Q. Back on the record.</p> <p>4 So, sir, before we took a break we were</p> <p>5 looking at the agenda and the board minutes of LT's</p> <p>6 Board of Education for June of 2000. Looking at</p> <p>7 exhibit -- I'm sorry. I just want to make sure.</p> <p>8 So, the Board of Education approved, the same vote</p> <p>9 was done to approve payment of the treasurer's</p> <p>10 invoice and to approve the contract; is that</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. In the first page of Exhibit T, this is a</p> <p>14 memorandum from Lisa Beckwith to the Board, and Lisa</p> <p>15 Beckwith at this time was the director of business</p> <p>16 services, correct?</p> <p>17 A. That's correct.</p> <p>18 Q. And she says in the middle of her memo, she</p> <p>19 says: Also attached is a copy of the agreement that</p> <p>20 we made with the treasurer which pays the district</p> <p>21 \$106,403 for comparable services provided to other</p> <p>22 township districts but not to Lyons Township High</p> <p>23 School. Board of Education action is to approve a</p> <p>24 payment in the net amount of \$59,073.</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. Okay. This being --</p> <p>2 A. The rest is support materials.</p> <p>3 Q. -- the page with the --</p> <p>4 A. The page with the T which you referred.</p> <p>5 The pages that follow are the support documentation</p> <p>6 that outlines it the pro rata bill and the amount</p> <p>7 of -- if you look on the chart, the pro rata bill</p> <p>8 with District 204 is 165,476 which is referenced on</p> <p>9 the page. It's also referenced in 106,403 which is</p> <p>10 the next page outlined, which is the outsourcing of</p> <p>11 which the TTO is paying 204.</p> <p>12 MR. HOFFMAN: For the record, the client is</p> <p>13 referring to the February 29th, 2000, memo.</p> <p>14 BY MR. KALTENBACH:</p> <p>15 Q. That's where you're getting the 106,403</p> <p>16 from?</p> <p>17 A. Do you see what I'm talking about?</p> <p>18 Q. Yes, I do. Thank you.</p> <p>19 A. And the difference between the 165,476 and</p> <p>20 the 106,403 is the 59,073 payment.</p> <p>21 Q. And it's LT's position that the township</p> <p>22 trustees, my client, also approved that contract,</p> <p>23 correct?</p> <p>24 A. Yes, it is.</p>
<p style="text-align: right;">Page 63</p> <p>1 Why was the Board of Education action to</p> <p>2 approve a payment as opposed to approving a</p> <p>3 contract?</p> <p>4 A. They are asked to approve the expenditure</p> <p>5 because the contract of the agreement called for the</p> <p>6 offset. And so that 59 is the difference between</p> <p>7 the business services as is outlined in the</p> <p>8 agreement on -- there is no page number on it, but</p> <p>9 two pages past the memo of which you're referring.</p> <p>10 Q. When you say two pages, the second page</p> <p>11 appears to be a chart?</p> <p>12 A. It's the third.</p> <p>13 Q. It's the memorandum dated February 29th of</p> <p>14 2000 you're referring to?</p> <p>15 A. I am.</p> <p>16 Q. I'm sorry. Your testimony is the</p> <p>17 memorandum is the agreement?</p> <p>18 A. No. That's not what I said.</p> <p>19 Q. That's fine. I'm not sure what you said.</p> <p>20 A. That's not what I said.</p> <p>21 Q. What did you say? I was flipping to the</p> <p>22 page.</p> <p>23 A. This is the support materials of which this</p> <p>24 is the cover page.</p>	<p style="text-align: right;">Page 65</p> <p>1 Q. And what is that position based on?</p> <p>2 A. A couple of things: First off, once this</p> <p>3 took place, this -- this continued for the next 12</p> <p>4 years.</p> <p>5 Q. Okay.</p> <p>6 A. There was never any sort of a contact made.</p> <p>7 In fact, you know, if there was a problem with it,</p> <p>8 we were never alerted. I go back to the approval by</p> <p>9 the trustees of this agreement, which is documented.</p> <p>10 Q. Is that -- when you say it's documented, I</p> <p>11 just want to make sure I understand the universe</p> <p>12 you're talking about. Is that in the township</p> <p>13 trustees meeting of March of 2000?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. Let's go ahead and mark that so</p> <p>16 we're not guessing.</p> <p>17 (Exhibit Number 6 was marked</p> <p>18 for identification.)</p> <p>19 So, Dr. Kilrea, I'm handing you what's been</p> <p>20 marked Exhibit 6. I know it is a big thick</p> <p>21 document. Could you just summarize this whole thing</p> <p>22 and give it back to me in a couple of sentences?</p> <p>23 All right. So, you said that there is a couple of</p> <p>24 bases for LT's position that my client approved the</p>

Page 66

1 contract. One of them is kind of the yearly
 2 interactions for the next dozen or so years,
 3 whatever it is, correct?
 4 A. Yes.
 5 Q. Okay. And then is this the other one?
 6 A. Well --
 7 MR. HOFFMAN: I object to the pigeonholing.
 8 MR. KALTENBACH: I'm not trying to
 9 pigeonhole him.
 10 MR. HOFFMAN: I think you are, actually.
 11 MR. KALTENBACH: I'm actually not. I want
 12 to make sure I understand all the bases by which
 13 District 204 is contending that my client entered
 14 into its contract.
 15 THE WITNESS: Their agent represented to
 16 our Board of Education that he was acting at the
 17 support of the township trustees. It was voted on
 18 at the -- I believe it's the March, 2000, meeting.
 19 BY MR. KALTENBACH:
 20 Q. This is the minutes of which are Number 6
 21 in front of us?
 22 A. Right.
 23 Q. Okay.
 24 A. It was discussed at a prior board meeting

Page 67

1 prior to -- with the trustees. And so when the
 2 agent of the trustees appears in front of the 204
 3 board and says we're open to this verbally, and then
 4 we have confirmation of which this may be one of
 5 them, that truly tells another board that there is
 6 authorization here.
 7 Q. You said, of this may be one of them.
 8 You're referring this as Exhibit 6, correct?
 9 A. Yes.
 10 Q. And then one of them, what is the "them"?
 11 A. Another way of validating that there was an
 12 agreement.
 13 Q. Okay. So, what is it -- I think I know
 14 your answer, but I'm go to ask it anyway. What is
 15 it in Exhibit 6 you're looking at to support your
 16 position that my client approved the agreement?
 17 A. Well, you've already gone there. So, you
 18 can point out which one you think it is.
 19 Q. But I don't have to do that.
 20 A. Give me a moment.
 21 Q. Sure.
 22 A. I'll go over it. I want to make sure --
 23 Q. That's fine.
 24 A. If you look on the agenda.

Page 68

1 Q. Yes.
 2 A. District 204 business office. Number 8.
 3 Q. Right.
 4 A. Demonstrates that it's there on their
 5 agenda.
 6 Q. Okay.
 7 A. If you go to the minutes, which is the
 8 Tuesday, March 21st, 2000, which I believe is the
 9 first page of the minutes.
 10 Q. Correct.
 11 A. Bottom paragraph.
 12 Q. Okay.
 13 A. Mr. Healy submitted -- or Healy submitted
 14 to the trustees of proposal from District 204
 15 stating this office absorbed certain payroll
 16 accounts payable and computer process expenditures
 17 by District 204 as these costs will be incurred by
 18 the treasurer's office of Lyons Township High School
 19 where it totally utilizing the facilities of the
 20 treasurer's office.
 21 MR. KALTENBACH: I'm just going to say if
 22 you're going to read it, just so she can type it,
 23 just slow down a little bit.
 24 MR. HOFFMAN: You don't have to read it out

Page 69

1 loud.
 2 MR. KALTENBACH: He doesn't have to. If he
 3 wants to he can.
 4 THE WITNESS: I want to make sure you're
 5 seeing it.
 6 BY MR. KALTENBACH:
 7 Q. Yes. I am. Thank you.
 8 A. That's in the minutes, and then if you keep
 9 going --
 10 Q. Top of the next page?
 11 A. Top of the next page. That looks like
 12 Mr. Hartigan made a motion, and it was seconded by
 13 the only other trustee who was there, Mr. Nekola.
 14 And then the roll call vote was two ayes and zero
 15 nays.
 16 Q. And so this, is it 204's position that this
 17 demonstrates the formal authorization or approval by
 18 the township trustees to enter into the business
 19 services contract?
 20 A. Yeah. Yes.
 21 Q. The top of that second page says: A motion
 22 was made by Russel Hartigan, seconded by Joseph
 23 Nekola, to accept the proposal given. What does
 24 accept mean to District 204, Dr. Kilrea, in the

18 (Pages 66 - 69)

<p style="text-align: right;">Page 90</p> <p>1 say for simplistic purposes, is \$250,000 and we are 2 spending 200 in-house to do those things, there is a 3 net of \$50,000 that we're going to have to pay 4 versus the 250 in our expenditures. And so when we 5 build budgets, that assumption is in there. That's 6 a budget assumption, and so we rely upon this. And 7 then to hear that this is not going to happen or 8 that we're now going to come after this money for 9 things that we already paid for, that -- that's a 10 detriment. 11 Q. Is there an actual line item in LT's annual 12 budget that reflected the agreement relating to 13 business services? 14 A. You know, there are so many documents. I 15 will tell you, I would refer that to our expert when 16 they sit. 17 Q. Okay. 18 A. There are expenditures in there we do have, 19 we built in since the agreement was eliminated, we 20 have built in a 250 -- a quarter million dollars to 21 this operation. A quarter million dollars for 22 basically no services and no communication. That's 23 money away from kids, and that's frustrating to our 24 board. That's frustrating to me. Because that</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. Is LT contending that anyone currently 2 affiliated with the TTO is corrupt? 3 MR. HOFFMAN: You can ask the question. I 4 would just simply point out from Paragraph 71 it 5 refers to during the relevant years. 6 THE WITNESS: That's what it says. 7 MR. HOFFMAN: You can still answer the 8 question. 9 THE WITNESS: Absolutely unequivocally no. 10 We are not saying that current. 11 BY MR. KALTENBACH: 12 Q. Okay. 13 A. This is -- it's hard to argue when someone 14 is sitting in jail that there wasn't corruption. 15 Q. I'm not arguing with you. I just want to 16 now if you're accusing someone at the office now of 17 being corrupt? 18 A. No. It was during the relevant years. 19 Q. Fair enough. The next one is: LT's 20 hiring, retention and payment of the salaries and 21 benefits of the many employees who performed LT's 22 business functions during the relevant year. 23 These are the people whose positions are 24 identified on the annual memo from the director of</p>
<p style="text-align: right;">Page 91</p> <p>1 money is -- it should go where it belongs. It does 2 not belong to the treasurer's office. They don't 3 have fixed assets. That money belongs to the member 4 school districts and the students that are in those 5 districts. 6 Q. Okay. The next detriment, I guess, it says 7 its deferral -- I'm assuming LT's deferral -- of 8 efforts to remove itself from the archaic, corrupt 9 and unnecessary TTO system. 10 Who is -- who is the corrupt person or 11 persons that are being referred to? 12 A. The person who is in jail. 13 Q. Bob Healy? 14 A. Stole a million dollars. Excuse me. We 15 think only a million dollars. 16 Q. At least million dollars? 17 A. At least a million dollars. So, it could 18 be million. It could be 10 million or a billion. 19 We don't know. We also know there have been other 20 operations that have to close down due to 21 corruption. There are other township treasurer's 22 offices that were dissolved because of corruption. 23 I don't know names of individuals, but I can tell 24 you that has been a problem.</p>	<p style="text-align: right;">Page 93</p> <p>1 of business services? 2 A. Right. 3 Q. Did LT hire any of those people as a result 4 of the agreement? 5 A. No. Those people were in place for many 6 years beforehand, because of the inefficiencies of 7 the office. Because of the -- 8 MR. HOFFMAN: Which office? 9 THE WITNESS: The township treasurer's 10 office. There were times where the business office 11 would need information on things and the treasurer 12 would be four or five days delayed. I don't know, 13 have you ever had a staff of 300 people and they 14 don't get paid on time because they can't get a 15 signature on a check? This is before direct 16 deposit. 17 So, I go back to the '80s. I have seen a 18 document in the '80s that talks about how LT had 19 divorced itself from the TTO at that time. We pay 20 full pro rata share without any setoffs for many, 21 many -- for decades, because we felt it was 22 important to get it right in our school system. We 23 have a big budget, a very sophisticated system. We 24 have a school business official that's employed. We</p>

EXHIBIT 6

Memorandum

To: Robert Healy

From: Lisa Beckwith

Date: February 29, 2000

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- Annual salary and benefit costs for 3 employees as listed below:

	Salary	OASDI		Insurance	Insurance	
	<u>99-00</u>	<u>Medicare</u>	<u>IMRF</u>	<u>Medical</u>	<u>Life</u>	<u>Total</u>
Programmer Analyst	\$41,205	\$3,152	\$3,045		\$48	\$47,450
Accounts Payable Bkkeeper	\$23,192	\$1,774	\$1,714	\$7,028	\$48	\$33,756
Payroll Bookkeeper	\$21,861	\$1,672	\$1,616		\$48	\$25,197
Total	\$86,258	\$6,598	\$6,375	\$7,028	\$144	\$106,403

An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the fiscal year.

EXHIBIT

tabbies

6

EXHIBIT 7

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)
TOWNSHIP 38 NORTH, RANGE 12)
EAST,)

Plaintiff,)

vs.)

No. 13 CH 23386

LYONS TOWNSHIP HIGH SCHOOL)
DISTRICT 204,)

Defendant.)

TELEPHONIC EVIDENCE DEPOSITION OF ELISE S. GRIMES

December 1, 2016

Tucson, Arizona

BY: OLIVIA ARMENTA, RPR, CR No. 50411

UNITED COURT REPORTERS, INC.
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ucrincorporated@aol.com

UNITED COURT REPORTERS, INC.
Serving all of Arizona (520) 792-2600

EXHIBIT

7

1 APPEARANCES: (Telephonically)

2
3 FOR PLAINTIFF:

4 BARRY P. KALTENBACH, ESQUIRE
5 MILLER CANFIELD PADDOCK AND STONE, PLC
6 225 West Washington, Suite 2600
7 Chicago, Illinois 60606

8
9 FOR DEFENDANT:

10 JAY R. HOFFMAN, ESQUIRE
11 HOFFMAN LEGAL
12 20 North Clark Street, Suite 2500
13 Chicago, Illinois 60602
14

15 PURSUANT TO NOTICE, the telephonic evidence
16 deposition of ELISE S. GRIMES was taken at the offices of
17 United Court Reporters, Inc., 177 North Church Avenue,
18 Suite 200, in the City of Tucson, County of Pima, State of
19 Arizona, before Olivia Armenta, RPR, CR No. 50411, in and
20 for the State of Arizona, on December 1, 2016, commencing
21 at the hour of 2:00 p.m., in a certain cause now pending in
22 the Circuit Court, County of Cook, County Department,
23 Chancery Division.
24

25 * * * *

I N D E X

EXAMINATION OF ELISE S. GRIMES

	PAGE
By Mr. Hoffman	4
By Mr. Kaltenbach	30

E X H I B I T S :

Number	Description	Identified
1	Notice of Evidence Deposition	4

1 ELISE S. GRIMES,
2 having first been duly sworn to tell the truth, the whole
3 truth, and nothing but the truth, was examined and
4 testified as follows:

6 EXAMINATION

7 BY MR. HOFFMAN:

8 Q Can you please state your full name for the
9 record?

10 A Elise S. Grimes.

11 Q Where do you live?

12 A Tucson, Arizona.

13 Q Let the record reflect that this is the evidence
14 deposition of Dr. Elise Grimes, taken pursuant to notice.
15 The Notice of Evidence Deposition attached to this
16 transcript as Grimes Deposition Exhibit No. 1.

17 (Deposition Exhibit No. 1 was marked for
18 identification.)

19 BY MR. HOFFMAN:

20 Q Dr. Grimes, could you start by telling us about
21 your educational background?

22 A Yes. I have a Bachelor's Degree in Spanish and
23 German education. I have a Master's Degree in guidance and
24 counseling. I have a Specialist Degree in school
25 administration. And I have a Doctorate Degree in school

1 Q All right. Could you describe for me the role of
2 the TTO with respect to District 106?

3 A The Township Treasurer's Office virtually
4 controlled our money in terms of tax receipts, in terms of
5 State aid. All of our money flowed directly to them, which
6 was a surprise to me, coming from other parts of the State.

7 And then we did all the accounting of the School
8 District funds, and bills, and invoices, et cetera, and
9 then sent them to the Township Treasurer's Office to issue
10 the checks.

11 Q Is that the same or different process that you had
12 when you were Assistant Superintendent in Morrison,
13 Illinois?

14 A Very different.

15 Q Can you tell me how?

16 A Frankly, in Morrison we did everything. We did it
17 all. We issued the checks. We did the annual financial
18 reports. We hired the auditors. We paid the bills. We
19 did not have an entity that held our money, other than the
20 School District itself. And we were able to manage a
21 budget almost comparable to what I had at LaGrange
22 Highlands.

23 Q Do you have any understanding as to why there was
24 a TTO for District 106, but there was no TTO in Morrison,
25 Illinois?

1 MR. KALTENBACH: Objection, lack of
2 relevance.

3 THE WITNESS: Yes.

4 BY MR. HOFFMAN:

5 Q What was the basis for those concerns?

6 MR. KALTENBACH: Same.

7 THE WITNESS: Because I never knew who was
8 really investing our money, to be honest with you.

9 BY MR. HOFFMAN:

10 Q What do you mean by that?

11 A Who was helping Mr. Healy? Who was being hired as
12 an investment consultant? Who was helping him determine
13 what should be happening with our money? Yes, that
14 concerned me, and that was not always obvious.

15 The due diligence that School Districts have to
16 provide were really not required of the Township
17 Treasurer's Office during my time as the Superintendent.

18 Q I'd like to ask you a few questions generally
19 about the TTO as it relates to your District 106.

20 Could your District have performed its business
21 functions without the involvement of the TTO?

22 MR. KALTENBACH: Objection, relevance, and
23 lack of foundation.

24 THE WITNESS: I would say yes, considering
25 when I had a business manager in Tom Zakozik, and yes, when

1 I had a business manager in Susan Burckenmyer, because
2 she's now the Township Treasurer. So yes, I think we could
3 have done that.

4 BY MR. HOFFMAN:

5 Q At that time would you have needed any extra
6 personnel in order to perform all of those business
7 functions if the TTO had not been involved?

8 A I think it would have been a skill set that would
9 have been needed, rather than a change in staff or numbers
10 of staff. So many things could have been done
11 electronically.

12 Q What value did your District receive from paying
13 its share of the TTO expenditures?

14 MR. KALTENBACH: Objection, vague, and lack
15 of relevance.

16 BY MR. HOFFMAN:

17 Q If any?

18 A I can't evaluate that.

19 MR. HOFFMAN: All right. I have no further
20 questions for you, Dr. Grimes.

21 Mr. Kaltenbach is going to ask you some
22 questions.

23 MR. KALTENBACH: Jay and I need to go off the
24 record for a quick second.

25 (A discussion was held off the record.)

EXHIBIT 8

EDUCATION IS EVERYONE'S RESPONSIBILITY

Township Trustees of Schools

TOWNSHIP 38 NORTH, RANGE 12 EAST

P.O. BOX #1246
930 BARNSDALE ROAD
LA GRANGE PARK, ILLINOIS 60526-9346

BOARD OF SCHOOL TRUSTEES-
Joseph Nekola, President
Donna A. Milich, Trustee
Russell W. Hartigan, Trustee

ROBERT G. HEALY
TOWNSHIP SCHOOL TREASURER
Telephone: Area 708-352-4480
Fax: 708-352-4417

NOTICE

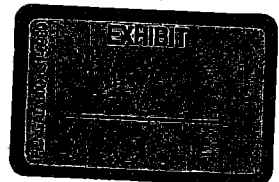
THE RESCHEDULED REGULAR MEETING OF THE BOARD OF THE LYONS TOWNSHIP TRUSTEES OF SCHOOLS HAS BEEN RESCHEDULED FOR TUESDAY, MARCH 21, 2000 AT 11:00 A.M. AT THE TOWNSHIP SCHOOL TREASURER'S OFFICE, 930 BARNSDALE ROAD, LA GRANGE PARK, ILLINOIS.

AGENDA

1. ROLL CALL
2. PUBLIC COMMENTS
3. APPROVAL OF MINUTES FROM THE REGULAR QUARTERLY MEETING OF DECEMBER 9, 1999, AND THE OFFICIAL POST ELECTION ORGANIZATIONAL MEETING FOR THE LYONS TOWNSHIP SCHOOL TRUSTEES, DECEMBER 9, 1999.
4. APPROVAL OF REPORTS FOR SEPTEMBER, OCTOBER, AND NOVEMBER 1999
 - A. DISTRICT OPERATIONS
 - B. DISTRIBUTIVE FUND
 - C. INVESTMENT REPORTS
5. APPROVAL OF TREASURER'S OFFICE EXPENSES FOR THE QUARTER.
6. PROPERTY TRANSFERS
7.
 - A. DISTRICT #101
 - B. DISTRICT #102
 - C. DISTRICT #204
8. DISTRICT 204 BUSINESS OFFICE
9. SCHOLARSHIP FUND UPDATE
10. TRUSTEE SEMINAR
11. APPROVAL OF \$405,000.00 WORKING CASH BOND FOR DISTRICT #217
12. COOK COUNTY TREASURER
13. OTHER BUSINESS
14. ADJOURNMENT

EXHIBIT

8



**MINUTES OF THE REGULAR MEETING OF THE
BOARD OF LYONS TOWNSHIP TRUSTEES OF SCHOOLS
TUESDAY, MARCH 21, 2000**

The meeting of the Lyons Township Trustees of Schools was held in the office of the Township School Treasurer, 930 Barnsdale Road, La Grange Park, Illinois , Tuesday, March 21, 2000 at 11:00 A.M

President, Joseph Nekola called the meeting to order at 11:00 A.M.

ROLL CALL: Present - Russell Hartigan, Joseph Nekola.
 Absent - Donna Milich

Also present was Treasurer and Ex-Officio, Clerk, Robert G. Healy,.

A motion was made by Russell Hartigan seconded by Joseph Nekola to approve the minutes from the regular quarterly meeting of December 9, 1999 and the official post election organizational meeting for the Lyons Township School Trustees of December 9, 1999.

ROLL CALL: Ayes - Russell Hartigan, Joseph Nekola
 Nays - None

A motion was made by Russell Hartigan seconded by Joseph Nekola to approve the monthly reports for September, October, and November 1999.

ROLL CALL: Ayes - Russell Hartigan, Joseph Nekola
 Nays - None.

The trustees instructed Healy to get approval on any legal bill in excess of \$1,000.00 prior to the check being issued.

A motion was made by Joseph Nekola seconded by Russell Hartigan to approve the Treasurer's office quarterly expenses.

ROLL CALL: Ayes - Russell Hartigan, Joseph Nekola
 Nays - None

Healy notified the board that there are upcoming property transfers in the works for three different districts. The board advised Healy to obtain authorization/resolution at a subsequent meeting.

Healy submitted to the Trustees the proposal from District 204 stating this office absorb certain payroll, accounts payable and computer processing expenditures by District 204. As these costs would be incurred by the Treasurer's office if Lyons Township High School were to totally utilize the facilities of the Treasurer's office. These costs would certainly be incurred. A point to be clarified is to make sure that workman's compensation is covered. A further recommendation by Trustee Hartigan is that the trustees be given an evaluation of the employee's performance for those aforementioned personnel employed at the high school.

Minutes - March 21, 2000

Page 2

A motion was made by Russell Hartigan seconded by Joseph Nekola to accept the proposal given to the Lyons Township Trustees of Schools by Cook County High School District #204.

ROLL CALL: Ayes - Joseph Nekola, Russell Hartigan
Nays - None

Treasurer Healy updated the Trustees regarding the Scholarship Fund. The Trustees reviewed correspondence from Michael E. Olsen, P. C. and articles of incorporation of the LTST Scholarship Fund Corporation. Treasurer Healy will be in further contact with Mr. Olsen regarding a time line and review of the corporation status.

Treasurer Healy advised the board of the Trustees Seminar to be held May 19 - 21, 2000 at Pheasant Run in St. Charles, Illinois. Will need to know who will be attending the seminar in the near future.

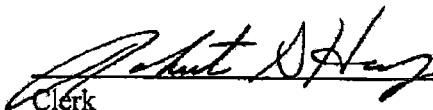
A motion was made by Russell Hartigan seconded by Joseph Nekola to approve the \$405,000.00 Working Cash bond for High School District #217.

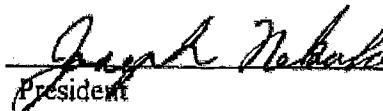
ROLL CALL: Ayes - Joseph Nekola, Russell Hartigan
Nays - None

Treasurer Healy informed the Trustees that the office of the Cook County Treasurer has continued to deviate from prior years distribution patterns. Repeated discussions by the Cook County Treasurer's association with Treasurer Pappas and her staff seem to be of no avail. Multiple unanswered questions about procedures and financial back up seem to have taken a back burner with the Cook County Treasurer.

A motion was made by Russell Hartigan seconded by Joseph Nekola to adjourn.
All trustees signified acceptance by saying "aye". Motion carried.

The meeting adjourned at 12:15 P.M.


Clerk


President

Memorandum

To: Robert Healy

From: Lisa Beckwith

Date: February 29, 2000

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

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An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the fiscal year.

EXHIBIT 9

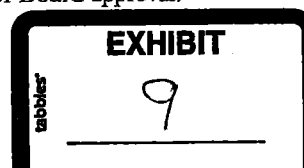
**REGULAR MEETING OF THE BOARD OF EDUCATION
LYONS TOWNSHIP HIGH SCHOOL, DISTRICT 204
100 South Brainard Avenue, Room 103-104
LaGrange, IL 60525
Monday, June 19, 2000 - 7:30 p.m.**

AGENDA

TIME

PAGE

- | | | | |
|------|------|--|-------------|
| 7:30 | I. | <u>OPENING AND ROLL CALL</u> | |
| 7:30 | II. | <u>AGENDA APPROVAL/ORDER OF BUSINESS</u>
Approval of agenda as prepared or members may request consideration of modification to the agenda. Changes will be determined by a majority of the Board..... | 1 |
| 7:30 | III. | <u>OPEN SESSION - COMMUNICATIONS</u>
Oral – Visitors' comments
Individuals who would like to address the Board of Education are requested to note the topic of interest on the available blue form. | |
| 8:00 | IV. | <u>SUPERINTENDENT'S DISTRICT REPORT</u>
A. Final 1999-2000 Board Goals Summary
B. End-of-Year Report | |
| 8:15 | V. | <u>UNFINISHED BUSINESS</u>
A. Action
1. Textbook/Instructional Material Change Request - 2 nd Reading (Dr. Weninger)
(under separate cover)
2. District-Owned Property in Willow Springs | |
| 8:45 | VI. | <u>NEW BUSINESS</u>
A. Action
1. Acceptance of Gift for Fieldhouse Floor
2. Textbook/Instructional Material Change Request - 1 st Reading (Dr. Weninger)
(under separate cover)
3. LT TechCorp Prosoft CIW Training Provider Agreement (Dr. Weninger)
(under separate cover)
B. Information
1. State of the Schools Status Report (Mr. Young)
2. Long-Range Technology Planning (Dr. Kelly)
3. Departmental Standards (Dr. Weninger) (under separate cover)
4. Transition Committee Recommendations (Dr. Weninger) | 2 |
| 9:15 | VII. | <u>CONSENT AGENDA</u>
A. Payment of Bills and Financial Statements (Dr. Beckwith)
1. Lyons Township High School - Approval is requested for payment of bills within various funds
2. Lyons Township High School - The financial statement for the month ending May 31, 2000 is presented for Board approval,
3. LaGrange Area Department of Special Education - Approval is requested for payment of bills within various funds
4. LaGrange Area Department of Special Education - The financial statement for the month ending May 31, 2000 is presented for Board approval.
B. Personnel - (Mr. Bill) | 6
7
8 |



D204-00182

1. LTHS Classified	10
a. Resignation	
2. LTHS Certified	12
a. Employment	
b. Retirement	
3. LADSE	19
a. Employment	
b. Resignation	
c. Maternity/Child Rearing Leave	
C. Minutes	
1. Regular Meeting - May 15, 2000 - Open and Closed Sessions	20
2. Special Meeting - May 22, 2000 - Open and Closed Sessions	29
3. Facilities Committee - June 13, 2000 (under separate cover)	
4. Curriculum Committee - June 15, 2000 (under separate cover)	
5. Budget/Finance Committee - June 16, 2000 (under separate cover)	
D. Rescind Previously Approved Bid for Combination Locks (Dr. Beckwith)	30
E. Award of Bids (Dr. Beckwith)	
1. Combination Locks	31
2. School Transportation	32
3. Athletic and PE Supplies	35
4. Athletic Training Supplies	36
5. Printing of School Newspaper	37
6. Yearbook Photographer Bid	41
7. Teacher/Student Desks, Chairs, Filing Cabinets, & Science Lab Stools	66
8. 2000 Security System Work (under separate cover)	
9. Swimming Pool Scoring Timing System	67
F. North Central Association Commission on Schools Annual Dues 2000-2001	68
G. Illinois Association of School Boards Annual Dues 2000-2001	69
H. Disposal of Surplus Property: Wood Joiner (Dr. Beckwith)	73
I. Resolution of Appointment to DAOES Board of Directors	74
J. Insurance Premiums (Dr. Beckwith)	76
K. Resolutions of Prevailing Rate of Wages for Lyons Township High School & La Grange Area Department of Special Education (Dr. Beckwith)	82
L. Appointment of Harold Huang as Ethics Officer	92
M. IMRF Resolution	93
N. Business Services Consultant	94
O. Donation of Equipment/Supplies	
1. 1991 Oldsmobile Cutlass	95
2. 2000 Buick Century Custom Silver	98
3. 1988 Buick Century	102
4. Computer, Monitor, and Keyboard	105
P. Township Treasurer's Invoice	107
Q. Intergovernmental Cooperative Agreement to Establish the Illinois Gas Cooperative (Dr. Beckwith)	111

9:20 VIII.

CLOSED SESSION

Recommended adjournment into Closed Session for the purposes of considering information regarding the appointment, employment or dismissal of an employee or officer or to hear testimony on a complaint lodged against an employee or officer to determine its validity; to discuss collective negotiating matters between public employers and employees or their representatives or deliberations concerning salary schedules for one or more classes of employees; for student discipline; for the purpose of considering the selling price of real estate; litigation; and for security related issues.

11:00 IX. OPEN SESSION
Board action possible

11:05 X. ADJOURNMENT

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
BOARD OF EDUCATION
MINUTES OF REGULAR MEETING
BOARD-CONFERENCE ROOM
MONDAY, JUNE 19, 2000
7:30 p.m.

BOARD OF EDUCATION

PRESENT ABSENT

Mr. Todd Shapiro, President	<u>X</u>	—
Mrs. Mary Clare Loftus, Vice President	<u>X</u>	—
Ms. Marilyn N. Marchetti, Secretary	<u>X</u>	—
Mr. Terrence J. Gaffney	<u>X</u>	—
Mr. Mark N. Pera	<u>X</u>	—
Dr. John T. Polacek	<u>X</u>	—
Dr. Arthur W. Sprague, Jr.	<u>X</u>	—

STAFF PRESENT

Dr. Dennis Kelly	Dr. Lisa Beckwith	Ms. Joyce Marine
Dr. Attila Weninger	Mr. John L. Young	Ms. Jennifer Bialobok
Dr. Larry Bond	Ms. Jeanne Widing	

VISITORS PRESENT

Mr. Mike Cittleon	Mr. Scott Trokey	Mr. Jerry Halterman
Mr. Bill Orman	Mr. Jim Tweedie	Ms. Kathleen Davies
Mr. Rick Knop	Mr. Richard J. Turk, Jr.	Mr. Mark Johnson
Mr. Al Polich	Ms. Joan Rycal	Ms. Cynthia Schilsky
Mr. Brad Nelson	Mr. Mike Morris	Mr. Scott Anderle
Mr. David Healy		

CALL TO ORDER

Mr. Shapiro called the meeting to order at 7:30 p.m. with the Pledge of Allegiance.

ACTION NO. 1: Agenda Approval/Order of Business

The following items will be added to the Consent Agenda: "LTHS Certified Personnel Resignation," item VII-B-2-c, and "Resolution and Application for Building Permit," item VII-R.

Dr. Polacek moved, seconded by Mr. Pera, to approve the agenda as amended, including the Closed Session.

By unanimous voice vote, the motion was adopted.

COMMUNICATIONS

Mr. James Tweedie, owner of Wyckoff Portraits Inc., addressed the Board concerning the yearbook contract. He urged the Board to reconsider the proposed motion to award the contract to a different vendor in light of the fact that Wyckoff's has been photographing LT students for the past 50 years. Mr. Tweedie asked that the Board compare Wyckoff's work to the proposed bid winner and to keep in mind Wyckoff's proximity to LT.

Dr. Sprague asked that the Yearbook Photographer Bid be pulled from the Consent Agenda and discussed as a separate issue.

SUPERINTENDENT'S DISTRICT REPORT

Dr. Kelly provided the following thoughts on the 1999-2000 school year: 1) Congratulations to Principal John L. Young on a wonderful graduation ceremony; over 700 well-behaved students received their diplomas in 51 minutes; 2) 27 top-quality employees have been hired for next year, combining new and experienced teachers; 3) the Facility Plan is progressing nicely, in part due to the support and generosity of parents and the community, and we're still showing a positive cash flow; 4) the area of curriculum is moving forward, from the completion of curriculum reviews to the exciting potential of the L.T. TechCorp Program; 5) communications have improved due to weekly staff meetings and Team LT; thanks to the administrative staff for their efforts; 6) cooperation from the staff has improved, thanks to Jeanne Widing and Paul Witt for their hard work in resolving problems, communicating honestly, and working towards the betterment of the district; and 7) thanks to the Board for the great amount of time and energy they devote to LT.

Dr. Kelly presented a final 1999-2000 Board goals summary. 1) *Continue to improve the academic performance of all students and academic programs:* the curriculum review process for Drivers' Ed, Health, Math, Phys Ed, and Social Studies remains on track, the Transition Committee report is finished, and Professional Period Assignments as content-based tutorial periods will be added to LTHSFA contract language. 2) *Improve communications throughout the District and foster a positive school climate:* numerous meetings with employees, staff, and students were held, opening up lines of communication; student activities and involvement were successful, encompassing 85% student participation; and the Peaceable Schools Initiative is now an integral part of LT. 3) *Continue to refine the teacher recruitment process screening, interviewing, employment, induction, mentoring, and professional development processes in order to build and retain a world-class staff:* a very sophisticated recruitment process has been set in place to handle the large numbers of new recruits anticipated over the next few years; 25+ certified staff have been hired for next year; and training for administrative staff has been set up for August. 4) *Maintain the process for ensuring a balanced budget, continue implementation of the school facility plan, and implement a software system for the retrieval and storage of student and financial data:* we've maintained a balanced budget while maintaining services for students; development of the 2001 budget has already begun; summer facilities projects have started (asbestos removal, concession stand, remodeling of bookstore and art rooms); and the CIMS computer system will have completed a full cycle in July. Dr. Kelly stated that with the upcoming school year, new Board goals will be needed, and that the District will look to the community for their input. Mr. Shapiro complimented the superintendent and his staff on their diligent work to meet the Board goals.

UNFINISHED BUSINESS

ACTION NO. 2: Instructional Textbook/Material Change Requests - 2nd Reading Exhibit A

Mrs. Loftus moved, seconded by Dr. Sprague, to adopt the Instructional Textbook/Material Change Requests.

On roll call:

Ayes: Mr. Pera, Mr. Gaffney, Dr. Polacek, Dr. Sprague, Ms. Marchetti, Mrs. Loftus, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

ACTION NO. 3: District-Owned Property in Willow Springs

Dr. Polacek moved, seconded by Mrs. Loftus, to initiate the process of selling the School District's 69-acre parcel of vacant land on the west side of Willow Springs Road between 79th Street and German Church Road by authorizing the administration and attorneys for the Board to bring a recommendation to the Board on terms and conditions of sale which will maximize the sale price and the long-term receipt of real estate tax revenue from the property. In preparing the recommendation, the administration is authorized to obtain, among other appropriate information, an updated appraisal, an updated survey, a commitment for title insurance in the minimum amount, and advice from a real estate planning and development expert at a cost not to exceed \$12,000.

All Board members agreed that for this particular motion to be adopted, a 5-2 vote would be essential (versus the usual 4-3 majority), since any subsequent vote to sell the property would require a 5-2 margin. After the motion was made, a lengthy discussion followed, with each Board member sharing his/her thoughts on the proposed property sale. Public sentiment of the School District's constituency to retain the property, no present compelling financial need, not being able to adequately judge the future enrollment needs of the District, and the fact that the land is irreplaceable were all reasons given by Board members opposed to the land sale. Board members favoring to dispose of the property felt that a sale was long overdue, the likelihood of ever needing a third site for student attendance was unlikely, money generated from the sale would benefit students, our present school facilities allow ample room for expansion if needed, and the sale would benefit a lot of taxpayers.

On roll call:

Ayes: Dr. Sprague, Dr. Polacek, Mrs. Loftus, Mr. Shapiro
Nays: Ms. Marchetti, Mr. Gaffney, Mr. Pera
Abstain: None
Absent: None

With 4 affirmative votes and 3 negative votes, the motion was lost.

ACTION NO. 4: Tabling of Discussion of District-Owned Property

Dr. Polacek moved, seconded by Ms. Marchetti, to table any discussion of District-owned property until February 2001.

By unanimous voice vote, the motion was adopted.

NEW BUSINESS

Textbook/Instructional Material Change Request - 1st Reading

Along with a request for a change in American Government AP and American History AP texts, Dr. Weninger reviewed the materials required for the Web Production class. Because the materials would run \$162.50 for a one-semester class, a decision would have to be made as to whether each student would be responsible for the entire cost or whether the Board would subsidize the cost. These texts will be on public display and will come to the Board as a second reading at the July meeting.

Fieldhouse Floor

A generous donation from the Allodi Family Foundation would allow the fieldhouse floor to be replaced with a safer, top-quality wood and rubberized floor. Architects from Healy, Snyder, Bender & Associates showed a rendering of the floor to the Board, which is projected to be completed by Thanksgiving at a cost of \$326,000.

ACTION NO. 5: Fieldhouse Floor Donation Agreement and Installment Note Exhibit B

Mr. Pera moved, seconded by Dr. Polacek, to accept a \$94,000 donation and a five-year, interest-free loan in an amount not to exceed \$232,000 from the Allodi Family Foundation to be used toward a new combined wood and rubberized floor in the Lyons Township High School North Campus Fieldhouse.

On roll call:

Ayes: Mr. Gaffney, Dr. Polacek, Dr. Sprague, Ms. Marchetti, Mrs. Loftus, Mr. Pera, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

Dr. Kelly publicly thanked Mr. Kevin Allodi for his generous gift and said that a dedication ceremony will be scheduled; a plaque denoting the gift donor will be ordered.

L.T. TechCorp Prosoft CIW Training Provider Agreement

Dr. Weninger explained the CIW Authorized Training Provider Agreement, which would offer another certification training opportunity as part of the L.T. TechCorp program. This training agreement would provide for certified web teachers at LT to provide industry-recognized training to students under the auspices of Prosoft.

ACTION NO. 6: CIW Training Provider Agreement Exhibit C

Mr. Pera moved, seconded by Mrs. Loftus, to approve the CIW Training Provider Agreement pending favorable review by the School District attorney.

On roll call:

Ayes: Ms. Marchetti, Mr. Gaffney, Dr. Polacek, Mrs. Loftus, Mr. Pera, Dr. Sprague, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

Yearbook Photographer Bid

Further clarification was made by Dr. Beckwith regarding the process of awarding a contract to designate a photographer to take pictures for the senior yearbook, as well as to photograph all underclassmen, faculty, administrators, board members and group pictures of clubs, activities, and athletic teams for inclusion in the yearbook. Although the District does not pay any money to the vendor, the contract recipient does benefit from the students who choose to place orders. The bid only designates the studio to provide the pictures for the yearbook; however, Dr. Beckwith emphasized that students could have their senior pictures taken at any studio of their choice. After three sealed bids were carefully reviewed for price, quality, and references, the School District, being legally required to accept the lowest responsible bid, decided to award the contract to Halterman Photography Studio. Some Board members stated that although Wyckoff Portraits Inc. is a community business that in the past has provided excellent service to LT, to go out for the re-bid process might set an unfair precedent and question the integrity of the bidding process.

ACTION NO. 7: Yearbook Photographer Bid Exhibit D

Mr. Pera moved, seconded by Dr. Sprague, to award the yearbook photographer contract to Halterman Photography Studio for the next three years: 2000-2001, 2001-2002, and 2002-2003.

On roll call:

Ayes: Mrs. Loftus, Dr. Sprague, Ms. Marchetti, Mr. Pera, Dr. Polacek, Mr. Gaffney, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

State-of-the-Schools Status Report

Principal John L. Young presented an overview of the 1999-2000 school year, saying that the state of the school is in good shape. Three new administrators in key positions did a great job: Kris Costopoulos,

Therese De Clerk, and Karen C. Brown, while Mike Maguire ably ran the Corral in his first year in charge of that facility. The Alternative Program went much smoother this year, now that the focus of the program has been established and better understood; additionally, the quality of the orchestra program keeps growing. Parent participation increased in all areas, and programs such as Peaceable Schools Initiative (PSI), Operation Snowball, and Alternative-to-Suspension continued to flourish. The Strength in Diversity Program will continue next year and focus more on students. The expanded security force has made people in the school feel more comfortable by guiding them and providing a more welcoming atmosphere. Many of our athletic teams fared well this year, including our volleyball team, coached by Joann Pyritz, that received a state commendation for quality of play and sportsmanship. Mr. Young acknowledged special appreciation and recognition to the Administrative Team, PSI Committee, Custodial and Maintenance Departments, the Assistant Principals' and Main Offices, security personnel, and to individuals Bill Pendell, Mike Hogan, Manny Reyes, and Jennifer Bialobok. In closing, Mr. Young emphasized that the most important ingredient to the school system is the students, and next year he will continue to work on increasing awareness of compassion at LT. Mr. Young then thanked Superintendent Kelly for allowing him to operate with a fairly free hand, and the Board for always putting students first, for helping make ideas become a reality, and for attending the numerous school events.

Long-Range Technology Planning

Dr. Kelly discussed the importance of developing a comprehensive district-wide technology plan to unite all aspects of technology. He offered to chair a technology committee that would aggressively proceed forward, researching schools and businesses, and subsequently utilize an expert to review the plan. Issues to be addressed include how all the pieces of technology fit together, whether to have one person in charge of technology or have several people oversee different areas, the future of the Discovery Centers, the impact of LT technology on feeder districts, and how to offer more direct services to students with less bureaucracy. Convening this summer, the committee's plan would hopefully be completed by March 2001. Board President Todd Shapiro informed Dr. Kelly that he has the support of the Board to move forward.

Departmental Standards Exhibit E

Dr. Weninger presented departmental standards for Business Education, Foreign Language, and Science. As part of the curriculum review process, the standards--developed by faculty and reviewed by External Advisory Groups--address what students should know and what they should be able to do as a result of having successfully completed respective programs of study. No formal Board action was requested or required at this time.

Transition Committee Recommendations Exhibit F

At this time, Dr. Weninger asked the Board to just review the Transition Committee recommendations and suggested action plans and to allow the Curriculum Committee to further discuss these recommendations at their summer meetings. Final recommendations will be brought to the full Board by the August 21 Board of Education meeting.

ACTION NO. 8: Approval of Consent Agenda

Mr. Pera moved, seconded by Dr. Polacek, to approve the Consent Agenda as amended.

LTHS Monthly Financials

Approval of Lyons Township High School monthly bills in the amount of \$3,198,824.20. **Exhibit G**

Approval of Lyons Township High School financial statement for the month ending May 31, 2000.
Exhibit H

LADSE Financials

Approval of LaGrange Area Department of Special Education monthly bills in the amount of \$2,204,347.00. **Exhibit I**

Approval of LaGrange Area Department of Special Education financial statement for the month ending May 31, 2000.

PERSONNEL
LTHS Classified

Resignation

John Andrews--Security--North Campus--effective June 9, 2000--Salary \$10.00 hourly.

CERTIFIED

Employment

Vikki Koenig--Language Arts and Learning Resources Divisions (English .7/Discovery Center .3)--1.0 assignment--effective August 24, 2000--Salary \$39,177.26 (BA, Step 2).

Maureen Laude--Math/Science Division (Mathematics)--1.0 assignment--effective August 24, 2000--Salary \$73,080.65 (MA, Step 15).

William Meuer--Global Studies Division (Social Studies)--.8 assignment--effective August 24, 2000--Salary \$36,163.62 (based on MA, Step 3).

Patrick Page--Fine Arts division (Art)--.8 assignment--effective August 24, 2000--Salary \$32,547.26 (based on MA, Step 1).

Marilyn Zimny--Learning Resources Division--(Discovery Center)--1.0 assignment--effective August 24, 2000--Salary \$66,676.68 (MA, Step 11).

Retirement

Paul Guyer--Math/Science Division (Mathematics)--effective June 9, 2000.

Resignation

Mary Baptist Brown--Purchasing and Accounting Manager--effective July 4, 2000.

LADSE

Employment

Mary Ann Stec - 1.0 Purchased Service Speech/Language Pathologist, subject to the Local funding program, beginning August 21, 2000, a contract of 185 days, at an annual salary of \$35,501.

Resignations

Joan C. Espirito-Santo - 1.0 Speech/Language Pathologist, effective June 9, 2000.

Amy Garcia - 1.0 CD Program Paraeducator, effective May 26, 2000.

Keshia Gipson - 1.0 School Psychologist, effective June 9, 2000.

Nealy Marshall - 1.0 D/HH Elementary Teacher, effective June 9, 2000.

Maternity/Child Rearing Leave

Lauren Smith - 1.0 School Psychologist, effective 2000-2001 school year.

Minutes:

Regular Meeting - Open and Closed Sessions - May 15, 2000
Special Meeting - Open and Closed Sessions, May 22, 2000
Facilities Committee - June 13, 2000
Curriculum Committee - June 15, 2000
Budget/Finance Committee - June 16, 2000

Rescind Previously Approved Bid for Combination Locks Exhibit J

Awarding of Bids:

1. Combination Locks	DGM Sales Inc.	\$26,100.00
2. School Transportation 1-year contract extension)	Laidlaw	Exhibit K
3. Athletic & PE Supplies	Dekan Athletic	\$3,909.00
	Don's World of Sports	\$5,486.15
	Hayden's Athletic Specialists	\$6,636.08
	Prestige Office Products	\$108.40
	Ridell/All American	\$4,963.78
	Soccer 2000 Inc.	\$229.00
	Sportdecals	\$552.50
	Sports International, Inc.	\$2,632.60

	Sport Supply Group	<u>\$827.35</u>
	Total	\$25,344.86
4. Athletic Training Supplies	Active Athlete	\$21.33
	Medco Supply Company	\$4,713.60
	Micro Bio-Medics	\$1,018.70
	School Health Corporation	<u>\$413.80</u>
	Total	\$6,167.43
5. Printing of School Newspaper	Regional Publishing Corporation	Exhibit L
6. Teacher/Student Desks, Chairs,	Beckley Cardy/School Specialties	\$2,220.00
Filing Cabinets & Science	Frank Cooney Company, Inc.	\$8,903.82
Lab Stools	HON	\$1,719.31
	Lowery McDonnell Company	<u>\$6,147.20</u>
	Total	\$18,990.33
7. Swimming Pool Timing/ Scoring System	Colorado Time Systems	\$29,300
8. 2000 Security System Work	Midco, Inc.	\$203,777

North Central Association Commission on Schools Annual Dues 2000-2001 Exhibit M

Illinois Association of School Boards Annual Dues 2000-2001 Exhibit N

Disposal of Surplus Property: Wood Joiner

Resolution of Appointment to DAOES Board of Directors Exhibit O

Insurance Premiums Exhibit P

**Resolutions of Prevailing Rate of Wages for Lyons Township High School & La Grange Area
Department of Special Education Exhibit Q**

Appointment of Harold Huang as Ethics Officer of School District for 2000-2001 School Year

IMRF Resolution Exhibit R

Business Services Consultant Exhibit S

Donation of Equipment/Supplies

1. 1991 Oldsmobile Cutlass, by Mr. Michael Radak.

2. 2000 Buick Century Custom Silver, by Ray Buick.
3. 1988 Buick Century, by Mr. Theodore E. Pannkoke.
4. Compaq Desktop EN Series, Monitor, & Keyboard, by Country Companies Insurance Group.

Township Treasurer's Invoice Exhibit T

Intergovernmental Cooperative Agreement to Establish the Illinois Gas Cooperative Exhibit U

Resolution & Application for Building Permit Exhibit V

On roll call:

Ayes: Mr. Pera, Mr. Gaffney, Dr. Polacek, Dr. Sprague, Ms. Marchetti, Mrs. Loftus, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

As this was Dr. Beckwith's last meeting, Dr. Kelly and each individual Board member expressed their gratitude and extended their best wishes to Dr. Beckwith.

CLOSED SESSION

At 10:04 p.m., Mr. Shapiro adjourned the meeting into Closed Session for the purposes of considering information regarding the appointment, employment, or dismissal of an employee or officer or to hear testimony on a complaint lodged against an employee or officer to determine its validity; to discuss collective negotiating matters between public employers and employees or their representatives or deliberations concerning salary schedules for one or more classes of employees; student discipline; for the purpose of considering the selling price of real estate by the School Board; litigation; and for security-related issues.

At 11:40 p.m., the meeting reconvened in Open Session.

ACTION NO. 9: Approval of Non-Contractual Classified Staff Plan Exhibit W

Dr. Polacek moved, seconded by Ms. Marchetti, to approve the Non-Contractual Classified Staff Plan and salary proposals.

On roll call:

Ayes: Dr. Polacek, Ms. Marchetti, Mr. Pera, Dr. Sprague, Mr. Gaffney, Mrs. Loftus, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

ACTION NO. 10: LTHSFA Contract Agreement

Ms. Marchetti moved, seconded by Dr. Polacek, to approve the Negotiated Agreement between the Board of Education of Lyons Township High School District 204, Cook County, and Lyons Township High School Faculty Association, 2001-2005.

On roll call:

Ayes: Mr. Gaffney, Dr. Polacek, Dr. Sprague, Ms. Marchetti, Mrs. Loftus, Mr. Pera, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

ACTION NO. 11: Approval of Administrators' Recruitment and Retirement Incentives

Dr. Polacek moved, seconded by Mr. Pera, to approve the Administrators' Recruitment and Retirement Incentives as amended.

On roll call:

Ayes: Ms. Marchetti, Mr. Gaffney, Dr. Polacek, Mrs. Loftus, Mr. Pera, Dr. Sprague, Mr. Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

ACTION NO. 12: Approval of Administrators' Salary Increases

Mr. Pera moved, seconded by Dr. Polacek, to approve the proposed administrators' salary increases for the 2000-2001 school year, as amended, for the following personnel: Tom Bill, Attila Weninger, John L. Young, Larry Bond, Karen C. Brown, Kris Costopoulos, Mike Hogan, Sy Karlin, Lilane Koehn, Mike Morris, Bill Pendell, Manny Reyes, Nancy Richter, Barry Swanson, Rick Swartz, Mary Baptist-Brown, Vickie Beck, Jennifer Bialobok, Orlando Coryell, Curtis Edwards, Bob Foskett, Walt Ihnatiuk.

District 204 – Regular Meeting
June 19, 2000 – Page Twelve

On roll call:

Ayes: Mrs. Loftus, Dr. Sprague, Ms. Marchetti, Mr. Pera, Dr. Polacek, Mr. Gaffney, Mr.
Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

ACTION NO. 13 Adjournment

Mr. Pera moved, seconded by Mr. Gaffney, to adjourn the meeting.

By unanimous voice vote, the motion was adopted, and the meeting was adjourned at 11:45 p.m.

President:

Secretary:

District 204 – Regular Meeting
June 19, 2000 – Page Twelve

On roll call:

Ayes: Mrs. Loftus, Dr. Sprague, Ms. Marchetti, Mr. Pera, Dr. Polacek, Mr. Gaffney, Mr.
Shapiro
Nays: None
Abstain: None
Absent: None

The motion was adopted.

ACTION NO. 13 Adjournment

Mr. Pera moved, seconded by Mr. Gaffney, to adjourn the meeting.

By unanimous voice vote, the motion was adopted, and the meeting was adjourned at 11:45 p.m.

President: *Todd M. Shapiro* Secretary: *Marilyn H. Marchetti*

-T-

MEMORANDUM

TO: Board of Education

FROM: Lisa Beckwith

DATE: June 14, 2000

SUBJECT: TOWNSHIP TREASURER EXPENDITURES

Attached is a copy of the Lyons Township High School Treasurer's bill for the 1999-2000 school year. The District's share is \$165,476, which is a 6% increase over the 1998-1999 school year. Also attached is a copy of the agreement that we made with the Treasurer, which pays the District \$106,403 for comparable services provided to other township districts but not to Lyons Township High School. Board of Education action is to approve a payment in the net amount of \$59,073.

EDUCATION IS EVERYONE'S RESPONSIBILITY

Township Trustees of Schools

TOWNSHIP 38 NORTH, RANGE 12 EAST

P.O. BOX #1246
930 BARNSDALE ROAD
LA GRANGE PARK, ILLINOIS 60526-9346

BOARD OF SCHOOL TRUSTEES
Joseph Nekola, President
Donna A. Milich, Trustee
Russell W. Hartigan, Trustee

ROBERT G. HEALY
TOWNSHIP SCHOOL TREASURER
Telephone: Area 708-352-4480
Fax: 708-352-4417

May 24, 2000

Dr. Dennis Kelly, Superintendent
Cook County High School District #204
100 S. Brainard Avenue
LaGrange, IL 60525

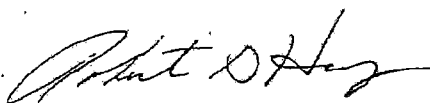
Dear Dr. Kelly:

Pursuant to Section 8-4 of the School Code, please consider this a revised invoice for services provided by the Lyons Township School Treasurer's office for the 1999 fiscal year. The District's share amounts to \$165,476.00.

Any increase in the District's fee will represent either an increase in the expenses of this office or an increase in the District's percentage of total revenues received by this office. Please note that bond proceeds are not considered as revenues in determining the percentage.

I hope your district is satisfied with the services which are being provided. If there are any suggestions on additional services which we can provide or if there are any questions please give me a call.

Sincerely,



Robert G. Healy
Lyons Township School Treasurer

RGH/grm

LYONS TOWNSHIP SCHOOL TREASURER
PRO RATA BILLING
FOR FISCAL YEAR ENDED JUNE 30, 1999

DISTRICT	REVENUES	PERCENTAGE	COST FOR DIST
101	8,240,261.38	4.6349	32,039.00
102	21,023,849.21	11.8253	81,742.00
103	15,155,331.54	8.5244	58,925.00
104	11,609,532.43	6.5300	45,138.00
105	10,372,117.93	5.8340	40,327.00
106	6,592,298.52	3.7080	25,631.00
107	7,227,922.03	4.0655	28,102.00
108	2,484,784.76	1.3976	9,661.00
109	18,213,581.00	10.2446	70,815.00
204	42,560,280.04	23.9389	165,476.00
LADSE	10,173,290.51	5.7222	39,554.00
217	20,362,503.26	11.4533	79,170.00
MEDICAL	3,771,585.40	2.1213	14,665.00
TOTAL	\$177,787,338.01	100.00	\$691,245.00

Memorandum

To: Robert Healy

From: Lisa Beckwith

Date: February 29, 2000

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- Annual salary and benefit costs for 3 employees as listed below:

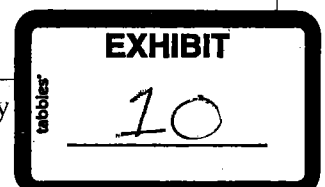
	Salary	OASDI		Insurance	Insurance	
	<u>99-00</u>	<u>Medicare</u>	<u>IMRF</u>	<u>Medical</u>	<u>Life</u>	<u>Total</u>
Programmer Analyst	\$41,205	\$3,152	\$3,045		\$48	\$47,450
Accounts Payable Bkkeeper	\$23,192	\$1,774	\$1,714	\$7,028	\$48	\$33,756
Payroll Bookkeeper	\$21,861	\$1,672	\$1,616		\$48	\$25,197
Total	\$86,258	\$6,598	\$6,375	\$7,028	\$144	\$106,403

An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the fiscal year.

EXHIBIT 10

1 STATE OF)
 2 ILLINOIS)
) SS.
 3 COUNTY OF COOK)
 4 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION
 5
 6 TOWNSHIP TRUTEES OF)
 SCHOOLS TOWNSHIP 38)
 7 NORTH, RANGE 12 EAST,)
)
 8)
)
 9 Plaintiff,)
)
 10 vs.) No. 13 CH 23386
)
 11 LYONS TOWNSHIP HIGH)
 SCHOOL DISTRICT 204,)
 12)
)
 13)
 Defendant.)

14
 15 The deposition of LISA BECKWITH
 16 taken before Meagan M. Cahill, Certified Shorthand
 17 Reporter, taken pursuant to the provisions of the
 18 Illinois Code of Civil Procedure and the Rules of the
 19 Supreme Court thereof pertaining to the taking of
 20 depositions for the purpose of discovery at 225 West
 21 Washington Street, Suite 2600, Chicago, Illinois,
 22 commencing at 2:04 p.m. on the 16th day of November,
 23 2016.
 24



<div>Page 2</div> <div>1 APPEARANCES:</div> <div>2 MILLER CANFIELD PADDOCK & STONE</div> <div>3 MR. BARRY KALTENBACH</div> <div>4 225 West Washington</div> <div>5 Suite 2600</div> <div>6 Chicago, Illinois 60606</div> <div>7 Phone: 312.460.4200</div> <div>8 E-Mail: bkaltenbach@millercanfield.com</div> <div>9 On behalf of the Plaintiff;</div> <div>10 HOFFMAN LEGAL</div> <div>11 MR. JAY R. HOFFMAN</div> <div>12 20 North Clark Street</div> <div>13 Suite 2500</div> <div>14 Chicago, Illinois 60602</div> <div>15 Phone: 312.899.0899</div> <div>16 E-Mail: jay@hoffmanlegal.com</div> <div>17 On behalf of the Defendant.</div> <div>18 * * * * *</div>	<div>Page 4</div> <div>1 (Witness sworn.)</div> <div>2 WHEREUPON:</div> <div>3 LISA BECKWITH,</div> <div>4 called as a witness herein, having been first duly</div> <div>5 sworn, was examined and testified as follows:</div> <div>6 EXAMINATION</div> <div>7 BY MR. KALTENBACH:</div> <div>8 Q. It's Dr. Beckwith, correct?</div> <div>9 A. Lisa.</div> <div>10 Q. Lisa. Okay. Out of habit, I may refer</div> <div>11 to you as doctor at some point. It's drilled into me</div> <div>12 to be respectful of people who have achieved that</div> <div>13 title.</div> <div>14 Have you ever been deposed before?</div> <div>15 A. Yes.</div> <div>16 Q. Okay. If at some point you need a break,</div> <div>17 please let me know, and we'll take a break for you.</div> <div>18 I'll try to get through this as quickly as I can. If</div> <div>19 you need to consult with your attorney at some point</div> <div>20 regarding a privilege issue, you can do so. I don't</div> <div>21 anticipate you'll need to. Other than that, if you</div> <div>22 want to consult with your attorney, you're required</div> <div>23 to answer my question before you consult with him.</div> <div>24 If you don't understand a question</div>
<div>Page 3</div> <div>1 INDEX</div> <div>2 WITNESS PAGE</div> <div>3 LISA BECKWITH</div> <div>4</div> <div>5 Examination by Mr. Kaltenbach..... 4</div> <div>6 Examination by Mr. Hoffman.....147</div> <div>7 Further Examination by Mr. Kaltenbach.....149</div> <div>8</div> <div>9</div> <div>10 EXHIBITS</div> <div>11 BECKWITH DEPOSITION EXHIBIT PAGE</div> <div>12</div> <div>13 No. 1..... 14</div> <div>14 No. 2..... 16</div> <div>15 No. 3..... 18</div> <div>16 No. 4..... 53</div> <div>17 No. 5..... 57</div> <div>18 No. 6..... 65</div> <div>19 No. 7..... 82</div> <div>20 No. 8..... 86</div> <div>21 No. 9..... 128</div> <div>22 No. 10..... 131</div> <div>23</div> <div>24 (EXHIBITS RETAINED BY MR. KALTENBACH.)</div>	<div>Page 5</div> <div>1 that I've asked you or you don't hear the question --</div> <div>2 I have a loud voice, but today I'm kind of coughing a</div> <div>3 bit -- please let me know because if you answer it,</div> <div>4 I'll assume that you both heard and it understood it.</div> <div>5 Is that fair?</div> <div>6 A. Yes.</div> <div>7 Q. And finally, as you know from prior deps,</div> <div>8 we have a court reporter here; she's taking down</div> <div>9 everything that's said, but she doesn't take down</div> <div>10 hand gestures or head nods, or uh-huh or uh-uh come</div> <div>11 off the same on a transcript. So if I ask you to,</div> <div>12 you know, repeat your answer or something like that,</div> <div>13 please don't be offended, I just want to make sure</div> <div>14 the transcript comes out.</div> <div>15 A. Okay.</div> <div>16 Q. Why don't we start with your formal</div> <div>17 educational background, the different degrees that</div> <div>18 you have.</div> <div>19 A. I have a Doctorate in education with an</div> <div>20 emphasis in superintendency. I have a Master's</div> <div>21 degree in vocational education, and I have a</div> <div>22 Bachelor's in education -- business education.</div> <div>23 Q. Okay. When did you receive your</div> <div>24 bachelor's in business education?</div>

2 (Pages 2 - 5)

<p style="text-align: right;">Page 94</p> <p>1 office, the treasurer's office would then have 2 increased costs? 3 A. Yes. 4 Q. Do you have an opinion on by how much 5 those costs would increase? 6 A. My opinion would be it would be the same 7 staff from Lyons Township removed from Lyons Township 8 and replaced into the township treasurer's office to 9 perform the functions. 10 Q. So would it be the same salary and 11 benefits? Are you talking about, literally, the same 12 person simply becoming a township treasurer 13 employee -- 14 A. I'm talking about the same -- he's 15 talking about employing -- In my opinion, he's 16 talking about employing people in his office. So he 17 would have to replace it with, at least, the same 18 personnel type, so two accounts payable, one payroll, 19 and then the other positions that we've already 20 spoken about in order to handle the accounts payable 21 and payroll of Lyons Township High School. 22 Q. Okay. And he then writes, I would expect 23 that when the trustees of schools takes into 24 consideration these necessary increases, they would</p>	<p style="text-align: right;">Page 96</p> <p>1 A. I don't think it's fleshed out enough for 2 me to tell that. 3 Q. Okay. Did you understand that the 4 decision of whether or not to implement the second 5 proposal was not solely up to Mr. Healy, but rather 6 was up to the township trustees? 7 A. Yes, and I believe he infers that when he 8 says the township treasurer trustees of schools, in 9 the memorandum, will take into consideration this and 10 they would logically conclude this to be an 11 appropriate idea. 12 Q. He's implying that's it's the trustee's 13 ultimate decision? 14 A. Yes. 15 Q. Did Mr. Healy ever he tell you that he 16 had the authority to agree to proposal No. 2? 17 A. I never specifically asked him. 18 Q. Regardless of whether you asked him, I 19 just want to make sure the answer's clear. Did he 20 ever tell you that, though, even if you didn't ask 21 him? 22 A. He states in his letter that the board of 23 Trustees would take it into consideration. 24 Q. To your knowledge, did you or</p>
<p style="text-align: right;">Page 95</p> <p>1 logically conclude that a partial funding by the 2 treasurer's office to cover District 204's costs for 3 the business functions District 204 now performs 4 would be reasonable. 5 Did you understand -- Strike that? 6 Let me back up a minute. 7 What was your understanding of this 8 second proposal that Mr. Healy sets forth in his 9 letter? 10 A. I think Mr. Healy came to the revelation 11 that Lyons Township High School has big payroll, big 12 accounts payable, and big data processing needs and 13 that he couldn't perform it in his office, and he 14 would have to hire staff comparable to Lyons Township 15 to get the same -- to provide the same services and 16 the same quality of services for Lyons Township High 17 School. And he states that he thinks his board of 18 trustees would find that reasonable because the cost 19 would increase at his township treasurer and, 20 therefore, the cost to the all the elementary 21 districts would increase. 22 Q. Did you have an understanding of whether 23 this second proposal would require an 24 intergovernmental agreement?</p>	<p style="text-align: right;">Page 97</p> <p>1 District 204 itself ever seek a legal opinion on 2 whether an intergovernmental agreement would be 3 necessary for the second proposal? 4 A. I don't know. 5 Q. If Mr. Healy absorbed -- and I say 6 Mr. Healy -- let me strike that question. 7 If the treasurer's office spent more 8 money to provide the services that District 204 was 9 providing, the result would be that the expenses of 10 the treasurer's office would go up, correct? 11 A. Yes. 12 Q. And ballpark, in any given year, LT was 13 paying 25 percent of the cost of the treasurer's 14 office, correct? 15 A. Yes. 16 Q. Okay. So LT -- If the cost of the 17 treasurer's office go up, LT is paying 25 percent of 18 a larger pie, correct? 19 A. Yes. 20 Q. Okay. So if -- Let's imagine that LT is 21 spending \$200,000 to provide services and Mr. Healy 22 now provides those services. And let's assume it's 23 the same \$200,000. Wouldn't LT be paying 25 percent 24 of that \$200,000?</p>

EXHIBIT 11

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

TOWNSHIP TRUSTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12
EAST,

Plaintiff,

vs.

LYONS TOWNSHIP HIGH SCHOOL
DISTRICT NO. 204

Defendants

)
)
)
) No. 13 CH 23386
)
) Judge Sophia H. Hall
) Calendar 14
)
)
)
)
)
)

AFFIDAVIT OF NANCY SYLVESTER

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

1. My name is Nancy Sylvester. I am providing this affidavit in connection with a motion for summary judgment that the plaintiff in this lawsuit is filing. I am competent to testify as to the facts and opinions set forth herein. My opinions expressed herein are based upon my review of the documents described in paragraph 5. The defendant has already been provided a list of the materials that I reviewed in forming my opinions and the defendant has already deposed me concerning my opinions. The opinions expressed herein are the same as set forth in my expert disclosure; I am not adding any additional opinions.

2. I have been a practicing professional parliamentarian since 1980. I am a member of the National Association of Parliamentarians, through which I am a Professional Registered Parliamentarian (PRP). I am also a member of the American Institute of Parliamentarians,

EXHIBIT

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99

through which I am a Certified Professional Parliamentarian and a Certified Professional Teacher of Parliamentary Procedure (CPP-T). I am one of only approximately thirty parliamentarians in the country to hold both PRP and CPP-T designations. During the periods 2001 through 2003 and 2009 through 2011 I was the Parliamentarian for the National Association of Parliamentarians, thereby serving as the "Parliamentarian for Parliamentarians."

3. I am the author of *The Complete Idiot's Guide to Robert's Rules*, First and Second Edition (2004 and 2010) and *The Guerilla Guide to Robert's Rules* (2006), along with various booklets and journal articles. In addition to my activities as a professional parliamentarian, I also provide training on leadership, teamwork, strategic planning, meeting and communications. I have been quoted as an expert in *The New York Times* and various other publications.

4. I received my Bachelor of Science in Speech from Indiana State University in 1969 and my Master of Arts in Communications from the University of Michigan in 1970. I am presently Professor Emeritus of Speech at Rock Valley College and prior to this was a Professor of Speech at Rock Valley College for approximately thirty-one years. I am the co-owner of Sylvester Enterprises, Inc.

5. In developing my opinions, I relied upon my professional education, training and experience, *Robert's Rules of Order Newly Revised* (11th ed. 2011)¹ (I also confirmed that the material aspects of this publication were similarly effective in 2000), and the following materials provided to me by counsel: Township Trustees of Schools Meeting Minutes from 1993 through 2010 (including agenda and attachments where available), except for July 18, 2005, May 23, 2007 and May 18, 2009, which were not available; those Meeting Minutes produced by District 204 (also called "LT") in this case, which consist of the Board of Education meetings in June from 2000 through 2012 (including those attachments produced by LT); Transcripts of the

¹ *Robert's* is the most widely used manual of parliamentary procedure in the United States.

depositions of Robert Healy, Russell Hartigan and Dr. Timothy Kilrea; and the Verified Amended Complaint for Declaratory Relief, and the First Amended Verified Counterclaim.

6. In accordance with *Robert's* and parliamentary practice, an organization may have a custom that certain words, such as "accept," "adopt" and "approve," as having meanings specific to that organization. This custom continues in effect until such time as the organization clearly demonstrates its intent to not abide by the custom

7. Based upon my review of the Township Trustees Meeting Minutes, it is my opinion that the Trustees used the word "accept" as the equivalent of "receives." This opinion is based upon the Trustees custom and usage as set forth in the Minutes. For example, on six occasions, the Trustees moved to "accept" a Canvass and Proclamation and file a resolution. This demonstrates the Trustees did not use the word "accept" to mean that they were entering into a contract. It demonstrates that they used the word "accept" to acknowledge official receipt. In another instance, the Trustees moved to "accept and approve" their agreement to pay legal bills. Clearly, the word "accept" did not mean the same as "approve" or the Trustees would not have used both words.

8. The Trustees did not use the word "approve" to indicate their receipt of a document. Rather, they used the word to signify their entering official consent to actions such as agreeing to a contract. This is demonstrated in yearly and biannual contracts, including the TTO leases, agreements with Puffer Hefty School Dist. No. 69 and the Treasurer's employment contracts. Based on custom and usage, the Trustees used "adopt" and "approve" interchangeably. The Trustees moved to "approve" or to "adopt" resolutions; they did not "accept" a resolution. The Trustees never demonstrated their intent to discontinue their custom of using the word

"accept" as being used to mean "receive" and as not being synonymous with "approve" or "adopt."

9. My review of the Minutes reveals that when the Trustees considered and decided to enter into an ongoing or reoccurring contract the contract was presented annually or biannually as appropriate. (For example, the Trustees entered into contracts with Puffer Hefty and the Treasurer.) The Trustees' custom was to review specific information about the nature of and changes from previous contracts, including the financial commitment and contract term. Where an exception exists, the Minutes nonetheless reflect that specific information was provided to the Trustees. For example, in January 2001, the Puffer Hefty written contract was included in the attachments to the Minutes. The Trustees "approved" contracts, but did not "accept" contracts.

10. The Minutes demonstrate the Trustees' custom of wanting to know by how much the applicable contract costs were increasing. Despite the fact that the amount LT was proposing to charge increased significantly on an annual basis, particularly as compared to the increases applicable to the Puffer Hefty and the Treasurer's contracts, there is no record that the Trustees were made aware of these increases.

11. While I do not opine that the Township Trustees voted to enter into a contract with LT, the referenced action of March 21, 2000 was only a proposal for one year. There is nothing to indicate it was intended to be a contract lasting beyond the one year referenced. The Minutes refer to "the proposal," not a contract or agreement; the proposal references payment of "[a]n invoice" "in May." This proposal is never again discussed in subsequent Minutes. The custom of the Trustees was to consider ongoing or recurring contracts as they were renewed for a new term.

12. With respect to LT's Board of Education, it is my opinion that, as reflected in the June 2000 Agenda and Meeting Minutes, the only relevant official action taken by the Board was to approve payment of one invoice from the Treasurer's office. This is based upon the fact that the June 2000 Agenda and Minutes do not reflect that the Board was voting to approve or enter into a contract. This opinion is also based upon the fact that the June 14, 2000 Memorandum from Dr. Beckwith states that the action to be taken by the Board is to approve one specific payment, not to approve or enter into a contract. There is nothing to suggest an ongoing or continuing contract was to be approved. There is nothing to suggest that the single payment was to be ongoing or continuing in nature. This is further based upon the fact that approval of the invoice was done through the Consent Agenda.

13. I also opine that, in accordance with *Robert's* and parliamentary practice, entering into a new contract such as the one alleged here is not within the purpose of the Consent Agenda. This is based upon the fact that *Robert's* defines the Consent Agenda as being for "routine business." The agreement alleged was not "routine business" for LT, because other Board of Education minutes show that entry into new, ongoing contracts with other entities was undertaken after discussion during New Business (in particular, at least on June 19, 2006, June 18, 2007, and June 20, 2011). None of the other Board of Education Minutes produced by LT predate this June 2000 meeting and reflect prior public discussion of the alleged agreement. It would be inappropriate for the Board of Education to enter into the alleged contract through the use of the Consent Agenda.

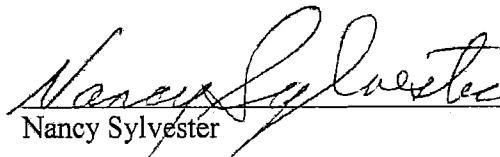

Nancy Sylvester
7/13/17
Date

EXHIBIT 12

STATE OF ILLINOIS)
) SS.
 COUNTY OF C O O K)

IN THE CIRCUIT COURT OF COOK COUNTY
 COUNTY DEPARTMENT-CHANCERY DIVISION

TOWNSHIP TRUSTEES OF)	
SCHOOLS TOWNSHIP 38 NORTH,)	
RANGE 12 EAST,)	
)	
Plaintiff and)	
Counter-Defendant,)	
)	
vs.)	No. 13 CH 23386
)	
LYONS TOWNSHIP HIGH SCHOOL)	Hon. Sophia H. Hall
DISTRICT 204,)	
)	Calendar 14
Defendant and)	
Counter-Plaintiff.)	

The deposition of NANCY SYLVESTER, called by Defendant and Counter-Plaintiff for examination, pursuant to notice and pursuant to the provisions of the Illinois Code of Civil Procedure and the Rules of the Supreme Court of the State of Illinois, for the purpose of discovery, taken before Stephanie A. Battaglia, CSR and Notary Public in and for the County of DuPage and State of Illinois, at 20 North Clark Street, Suite 2500, Chicago, Illinois, on April 20, 2017, at 1:00 p.m.

PRESENT:

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.
 BY: MR. BARRY P. KALTENBACH
 225 West Washington Street, Suite 2600
 Chicago, Illinois 60606
 (312) 460-4251 / FAX: (312) 460-4201
 e-mail: kaltenbach@millercanfield.com

appeared on behalf of Plaintiff and
 Counter-Defendant;

HOFFMAN LEGAL
 BY: MR. JAY HOFFMAN
 20 North Clark Street, Suite 2500
 Chicago, Illinois 60602
 (312) 899-0899
 e-mail: jay@hoffmanlegal.com

appeared on behalf of the Defendant and
 Counter-Plaintiff.

ALSO PRESENT:

Ms. Stephanie A. Battaglia, CSR, RMR, CRR
 Thompson Court Reporters

NANCY SYLVESTER,

called as a witness herein, having been first duly
 sworn was examined and testified as follows:

EXAMINATION

BY MR. HOFFMAN:

Q. Good afternoon, Ms. Sylvester.

How are you?

A. Good.

Q. I understand you recently had a medical
 procedure. I just want you to know that I will
 accommodate your needs in any way that you need. If
 you want to take a break just tell me that, we will.

A. Thank you.

Q. Just keep me apprised. Fair enough?

A. Fair enough, thank you.

Q. Have you been deposed before, ma'am?

A. Yes.

Q. How many times?

A. About five, seven, somewhere in there.

Q. What types of cases have you been deposed
 in?

A. In all of the cases it has been as an
 expert witness in parliamentary procedure.

Q. Have any of those cases been in Illinois?

INDEX

WITNESS: PAGE
 NANCY SYLVESTER 4

EXAMINED BY:

Mr. Hoffman 4
 Mr. Kaltenbach 90

EXHIBITS

Sylvester Exhibits
 (Retained by counsel and not attached)
 Exhibit 1 Invoice for Professional 10
 Services to: Township Trustees
 of Schools vs. Lyons
 Township H.S. District 204
 Exhibit 2 Plaintiff's Rule 213(f)(3) 15
 Expert Disclosure
 Nancy Sylvester
 Exhibit 3 Notes from Township Trustees 48
 of Schools Minutes
 Exhibit 4 Handwritten notes 57
 Exhibit 5 Handwritten notes 60
 Exhibit 6 Handwritten notes 70
 Exhibit 7 The Complete Idiot's Guide 87
 to Robert's Rules, Second Edition
 Nancy Sylvester, PRP, CPP-T
 Exhibit 8 The Guerrilla Guide to Robert's 88
 Rules
 Nancy Sylvester, PRP, CPP-T

A. Yes.

Q. How many?

A. Probably as much as 20 years ago,
 15 years ago, I did one for a hospital in Sycamore,
 Illinois.

Q. What type of case was that, please?

A. I am not sure how to answer what type of
 case.

Do you want me to describe what it was
 about?

Q. Yes.

A. The issue was that the board chairman had
 decided that he didn't like what was going to be the
 outcome of the meeting and so he got up, said the
 meeting was adjourned, left, and the other people who
 were the rest of the board members who were there and
 they stayed and did -- and followed procedure and then
 continued the meeting.

Q. Okay.

And your expert opinion had to do with
 the validity of the continued meeting?

A. Yes.

Q. And did you believe that it was valid?

A. Absolutely.

1 point of order citing the conflict is raised at any
2 time, the custom falls to the ground and the
3 conflicting provision in the parliamentary authority
4 or written rule must thereafter be complied with."

5 Q: Is that the entirety of the statement
6 about custom in the 11th Edition that you believe is
7 relevant to this issue?

8 A. Yes.

9 There is another sentence after that that
10 I didn't -- I can read it if you like.

11 Q. Do you believe it is significant?

12 A. I don't believe it is pertinent.

13 Q. If you don't think it is pertinent then
14 we don't need to read it.

15 A. Okay.

16 MR. HOFFMAN: Off the record.

17 (A discussion was held off the record.)

18 BY MR. HOFFMAN:

19 Q. You reviewed the TTO's meeting minutes
20 and formed the opinion that the trustees used the word
21 accept as the equivalent of receives, is that correct?

22 A. That's correct.

23 Q. Did you speak with any of the former or
24 current trustees concerning whether or not they had

1 But, remember, the definition from

2 Robert's --

3 Q. I didn't ask you to argue with me, I just
4 asked whether it was written down or not.

5 A. Sorry.

6 Q. So the answer is no, right?

7 A. The answer is no.

8 Q. If this custom was not written down do
9 you know how it was handed down from trustee to
10 trustee from 1993 through 2010?

11 A. By practice.

12 Q. Okay.

13 Was there perhaps a briefing that each
14 trustee received when they came in as to how the TTO
15 uniquely followed Robert's Rules of Order and what
16 their particular customs were to your knowledge?

17 A. I have no way of knowing that.

18 Although, it is typical for boards to do
19 some kind of training in between when they have new
20 board members, but it is not always done by any means.

21 Q. With respect to whether it is typical for
22 boards to train new members, you have absolutely no
23 idea as to the TTO whether they did that?

24 A. That's correct. That's correct.

1 this custom that you felt they did?

2 A. No.

3 Q. Why not?

4 A. I didn't feel I needed to.

5 Q. Why not?

6 A. Because there was enough documentation in
7 the minutes to demonstrate that beyond what I believed
8 was a shadow of a doubt.

9 Q. Well, the meeting minutes you reviewed
10 for the TTO were 1993 through 2010, correct?

11 A. Yes.

12 Q. Were the trustees the same in all of
13 those years?

14 A. No.

15 Q. Do they change every few years?

16 A. Yes.

17 Q. And were the trustees who started in 1993
18 the same trustees who were there in 2010?

19 A. No.

20 Q. And can you tell me if there was this
21 custom that you are testifying to was it written down
22 anywhere in any policy, procedure, rule book of the
23 TTO?

24 A. No, it is not.

1 MR. HOFFMAN: I move to strike the prior
2 answer as speculative.

3 BY MR. HOFFMAN:

4 Q. Tell me again if the trustees turned over
5 completely from 1993 through 2010 and there was no
6 written statement of the TTO as to the TTO's custom as
7 to how they used the word accept in their minutes, how
8 did the trustees know about this custom as the years
9 went by?

10 A. I have no way of knowing that, how.

11 Q. Wouldn't you be interested to know
12 whether Russell Hartigan who was a trustee in March of
13 2000 when the critical meeting occurred believed that
14 there was the type of custom of the TTO that you claim
15 there was?

16 A. I believed that I had enough information
17 in the minutes to draw the conclusion that I drew and
18 did not feel the need to search that out.

19 Q. That didn't answer my question.

20 A. Try it again.

21 Q. Wouldn't it be interesting to you to know
22 whether Judge Hartigan would say today that the custom
23 you found by looking through the minutes actually did
24 or did not exist at the TTO?

1 board minutes whether it was necessary for the board
2 to take a vote in order to accept the canvass and
3 proclamation or whether it was necessary to take a
4 vote to file the resolution or whether it was
5 necessary to take a vote for both of those things, do
6 you?

7 **A. There would be no reason to have to have**
8 **a vote to file a resolution.**

9 **And so one would assume then from that --**
10 **could conclude from that that to accept the canvass**
11 **and proclamation is what they were doing and they were**
12 **receiving it in essence saying they received it.**

13 **Q. Why would you need to take a vote in**
14 **order to acknowledge receiving something?**

15 **A. Because then it is made official record**
16 **in your minutes.**

17 **Q. But didn't they receive it when they**
18 **received it, isn't that a factual matter of when the**
19 **TTO board receives something?**

20 **A. But --**

21 **Q. Why do they need to take a vote to**
22 **acknowledge the receipt of something?**

23 **A. Because then it goes in their minutes**
24 **that they as a group have received it, not that the**

1 **TTO office somewhere received it, but that in their**
2 **meeting they as a group have received that document.**

3 **Q. But from 1993 through 2000 isn't it fair**
4 **to say that the TTO board received lots of documents**
5 **and proposed contracts and other written information?**

6 **A. Yes.**

7 **Q. And so the instances that you found in**
8 **which they mention in their board minutes that they**
9 **accepted something were these eight instances spanning**
10 **18 years, correct?**

11 **A. Correct.**

12 **Q. So why didn't they regularly -- why**
13 **didn't the TTO regularly state in its own minutes that**
14 **it accepted and thereby acknowledged the receipt of**
15 **something many more times over these 18 years if your**
16 **testimony about the use of the word accept is correct?**

17 **A. I don't know that I can make a judgment**
18 **of why they did what they did. It is --**

19 **Q. Well, you already have.**

20 **A. This is --**

21 **Q. You already have.**

22 **A. Can I finish my question?**

23 **Q. Yes, go ahead.**

24 **A. This is an official document that has to**

1 **do with an election and that election needs to be**
2 **entered. All of that information on that election**
3 **should be entered in the minutes so that down the road**
4 **that can be checked in their minutes.**

5 **Q. Why didn't the TTO vote to accept the**
6 **canvass and proclamation in 1994?**

7 **A. I do not --**

8 **Q. Why didn't the TTO vote to accept the**
9 **canvass and proclamation in 1996?**

10 **A. Because --**

11 **Q. Do you know?**

12 **A. Are you finished with the question?**

13 **Q. Yes.**

14 **A. I assumed when I read it because of the**
15 **length of their terms that they didn't have elections**
16 **in those years, and as you can see there are some**
17 **changes in when the elections occurred over the time.**

18 **Q. So you believe it was every other year?**

19 **A. There -- my conclusion -- I believe that**
20 **I have every single one of those motions -- of the**
21 **motion to accept represented here having to do with**
22 **canvass and proclamation.**

23 **Q. Well, not only that, but you believe that**
24 **you have every usage here of the term accept by the**

1 **TTO board in the 1993 through 2000 time period,**
2 **correct?**

3 **A. Yes, 2001, yes.**

4 **Q. How come some of the meetings listed here**
5 **from 2001 and -- I am sorry, strike that.**

6 **Why didn't the -- if the TTO every other**
7 **year voted to accept the canvass and proclamation how**
8 **come the last year you have is 2003, what about 2005,**
9 **'07, and '09?**

10 **A. It was not in there. That may be a**
11 **custom or law that they had to follow at that time. I**
12 **do not know that.**

13 **Q. And further down you have every instance**
14 **you found anyway in which the TTO board either adopted**
15 **or approved a resolution according to the minutes,**
16 **correct?**

17 **A. Correct.**

18 **Obviously there are some added in that I**
19 **didn't -- going back found, but, yes, those are only**
20 **having to do with resolutions.**

21 **Q. Okay.**

22 **MR. HOFFMAN: Let's mark this.**
23 **(Document marked Sylvester Exhibit 4 for**
24 **identification.)**

EXHIBIT 13

LYONS TOWNSHIP HIGH SCHOOL

Business Office • 100 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert Healy

FROM: David Sellers

SUBJECT: Treasurer's Office Responsibilities

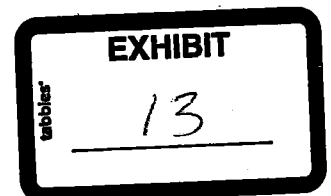
DATE: June 13, 2012

Following is a list of District 204 responsibilities that are a direct cost of the Township Treasurer's Office

- Payroll and Accounts Payable bank reconciliation
- Balance monthly General Ledger totals between Treasurer and LTHS
- Provide printing costs for envelopes for payroll and accounts payable checks.
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoice will be deferred and reviewed next fiscal year.

EXCELLENCE SINCE 1888



D204-00271✓

(ALSO REV0409.PDF)

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2011-12

	Salary 11-12	OASDI 6.2%	Medicare 1.45%	IMRF 8.32%	Medical Insurance	Life & LTD	Total	Percent Applied	Total
Database Administrator	\$ 93,978.00	\$ 5,826.64	\$ 1,362.68	\$ 7,818.97	\$ 12,235.40	\$ 306.36	\$ 121,528.05	75%	\$ 91,146.03
Accounts Payable Bookkeeper	\$ 45,059.04	\$ 2,793.86	\$ 653.36	\$ 3,748.91	\$ 13,399.26	\$ 32.40	\$ 65,686.63	100%	\$ 65,686.63
Accounts Payable Bookkeeper	\$ 40,757.76	\$ 2,526.98	\$ 590.99	\$ 3,391.05	\$ 12,235.40	\$ 32.40	\$ 59,534.57	100%	\$ 59,534.57
Payroll Specialist	\$ 46,290.96	\$ 2,870.04	\$ 671.22	\$ 3,851.41	\$ 12,235.40	\$ 32.40	\$ 65,951.43	100%	\$ 65,951.43
Accounting Manager	\$ 79,321.00	\$ 4,917.90	\$ 1,150.15	\$ 6,599.51	\$ 12,235.40	\$ 258.96	\$ 104,482.92	15%	\$ 15,672.44
	\$305,406.76	\$ 18,935.22	\$ 4,428.40	\$ 25,409.84	\$ 62,340.86	\$ 662.52	\$ 417,183.60		\$297,991.10

EXHIBIT 14

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)	
TOWNSHIP 38 NORTH RANGE 12)	
EAST)	
)	
Plaintiffs,)	No. 13 CH 23386
)	
vs.)	
)	
LYONS TOWNSHIP HIGH SCHOOL)	
DISTRICT NO. 204,)	
)	
Defendants.)	

The deposition of DAVID SELLERS, taken before JO ANN LOSOYA, C.S.R., pursuant to the provisions of the Illinois Code of Civil Procedure and the Rules of the Supreme Court thereof pertaining to the taking of depositions for the purpose of discovery at 225 West Washington Street, Chicago, Illinois commencing at 1:00 p.m. on November 23, 2016.

Page 2

1 PRESENT:
2
3 MILLER CANFIELD PADDOCK & STONE, PLC
4 MR. BARRY P. KALTENBACH
5 225 West Washington Street
6 Suite 2600
7 Chicago, Illinois 60606
8 (312) 460-4200
9 Appeared on behalf of Plaintiffs.
10
11 HOFFMAN LEGAL
12 MR. JAY R. HOFFMAN
13 20 North Clark Street
14 Suite 2500
15 Chicago, Illinois 60606
16 (312) 899-0899
17 jay@hoffmanlegal.com
18 Appeared on behalf of Defendants.
19
20 REPORTED BY: JO ANN LOSOYA
21 LICENSE #: 084-002437
22
23
24

Page 3

1 EXAMINATION
2 Witness Page Line
3 DAVID SELLERS
4 By Mr. KALTENBACH 4 7
5
6 *****
7 EXHIBITS
8 Deposition Exhibit Page Line
9 Exhibit No. 1..... 34 8
10 Exhibit No. 2..... 76 4
11 Exhibit No. 3..... 84 19
12 Exhibit No. 4..... 91 5
13 Exhibit No. 5..... 96 22
14 Exhibit No. 6..... 119 11
15
16 ***ORIGINAL EXHIBITS RETAINED BY COUNSEL***
17
18
19
20
21
22
23
24

Page 4

1 (Witness sworn at 1:15 p.m.)
2 WHEREUPON:
3 DAVID SELLERS,
4 called as a witness herein, having been first duly
5 sworn, was examined and testified as follows:
6 EXAMINATION
7 BY MR. KALTENBACH:
8 Q. Thank you. Mr. Sellers, just to avoid
9 the apparent confusion my office created on the
10 record, could you please state your name, please?
11 A. David Sellers.
12 Q. Thank you. Mr. Sellers, have you been
13 deposed before?
14 A. Yes.
15 Q. I'm not going to run through everything.
16 If at some point you need to take a break to use the
17 washroom, to get more water or coffee, please let us
18 know, we will take a short break to do that.
19 If you don't understand a question
20 that I ask you or you don't hear the question,
21 please let me know. Because if you answer it, I
22 will necessarily assume it was both intelligible to
23 you and that you heard it. Is that fair?
24 A. Yes.

Page 5

1 Q. What is your educational background, sir?
2 A. I have a master's of business
3 administration from Lewis University and a chief
4 school business official certificate or license
5 through Northern Illinois University. For my
6 bachelor's, I went to Elmhurst College.
7 Q. When did you get your bachelor's from
8 Elmhurst?
9 A. 1979.
10 Q. What was that in?
11 A. Business administration and music.
12 Q. Was that an -- I'm assuming that was a
13 dual major?
14 A. Yes.
15 Q. There is not one major -- it is not just
16 the business of music?
17 A. Yes, it is.
18 Q. Oh, really.
19 A. Yes.
20 Q. Is it actually two different degrees that
21 you received, though?
22 A. No. A bachelor of science in business
23 administration and music.
24 Q. I never heard of that one before and then

<p style="text-align: right;">Page 30</p> <p>1 else within District 204?</p> <p>2 A. Could you ask that question again?</p> <p>3 Q. Sure. So Ms. Whitlow had expressed her</p> <p>4 opinion that 204 should be paying for its own audit.</p> <p>5 Did you follow up on that communication with anyone</p> <p>6 else within District 204?</p> <p>7 A. No, I didn't feel it was my</p> <p>8 responsibility to do that.</p> <p>9 Q. Okay. Did any of the members of the</p> <p>10 board of education discuss the issue with you of</p> <p>11 whether District 204 should be paying for its own</p> <p>12 audit?</p> <p>13 A. My response would be I don't think people</p> <p>14 thought of it as an issue. You're using the word</p> <p>15 "issue." I don't think people thought of it as an</p> <p>16 issue. They considered it an arrangement.</p> <p>17 Q. I guess let me rephrase the question.</p> <p>18 Did you discuss the arrangement of District 204</p> <p>19 having its audit paid for by the treasurer's office</p> <p>20 with any member of the board of education?</p> <p>21 A. No.</p> <p>22 Q. How about any other employees within</p> <p>23 District 204?</p> <p>24 A. I don't recall a reason to have such a</p>	<p style="text-align: right;">Page 32</p> <p>1 A. No.</p> <p>2 Q. Did you discuss it with any of the</p> <p>3 individual trustees of schools?</p> <p>4 A. No.</p> <p>5 Q. Were you satisfied with the discussion to</p> <p>6 use Baker Tilly?</p> <p>7 A. Yes.</p> <p>8 Q. During the period of time that you were</p> <p>9 director of business services, you felt they did a</p> <p>10 competent job insofar as you're aware?</p> <p>11 A. I believe they satisfied the definition</p> <p>12 of an independent audit, and the normal scope of an</p> <p>13 independent audit that school districts expect.</p> <p>14 Q. Is there another auditor Mathieson</p> <p>15 Moyski? Does that ring a bell with you?</p> <p>16 A. Yes.</p> <p>17 Q. Who is the -- that's a firm, correct?</p> <p>18 A. Correct.</p> <p>19 MR. KALTENBACH: I'll just spell it for</p> <p>20 the court reporter. M-A-T-H-I-E-S-O-N and then</p> <p>21 M-O-Y-S-K-I. We'll just call it the Moyski firm, if</p> <p>22 that's okay.</p> <p>23 THE WITNESS: Yes.</p> <p>24</p>
<p style="text-align: right;">Page 31</p> <p>1 discussion.</p> <p>2 Q. It never really became something you gave</p> <p>3 a lot of thought about until that time in 2012 that</p> <p>4 we discussed?</p> <p>5 MR. HOFFMAN: Object to the form of the</p> <p>6 question.</p> <p>7 BY MR. KALTENBACH:</p> <p>8 Q. Is that the fair?</p> <p>9 A. The conversation I had with Bob Healy was</p> <p>10 to ask the question, Bob, you're paying for the</p> <p>11 audits of all the school districts, correct? To</p> <p>12 which he responded yes.</p> <p>13 Q. That was the end of it?</p> <p>14 A. Yeah.</p> <p>15 Q. You had gotten a satisfactory answer,</p> <p>16 correct?</p> <p>17 A. I did. It was not my -- it was not my</p> <p>18 place, my role, my responsibility to question a</p> <p>19 system that had been in place for years prior to my</p> <p>20 beginning my role as director of business services.</p> <p>21 Q. Did you discuss -- I just want to kind of</p> <p>22 eliminate this. Did you discuss that the treasurer</p> <p>23 was paying for 204's audit or the audits of other</p> <p>24 district with the members of Mr. Healy's staff?</p>	<p style="text-align: right;">Page 33</p> <p>1 BY MR. KALTENBACH:</p> <p>2 Q. What did the Moyski firm do for</p> <p>3 District 204?</p> <p>4 A. They replaced Baker Tilly.</p> <p>5 Q. Do you recall -- Strike that.</p> <p>6 When did they replace Baker Tilly?</p> <p>7 A. I think they did the 2013 audit.</p> <p>8 Q. When did the District 204's fiscal year</p> <p>9 end?</p> <p>10 A. June 30.</p> <p>11 Q. So fiscal year 2013 would end the year</p> <p>12 ending on June 30, 2013, correct?</p> <p>13 A. Correct.</p> <p>14 Q. So they -- your recollection is Moyski</p> <p>15 began doing the audits for 204 beginning with the</p> <p>16 audit for fiscal year 2013?</p> <p>17 A. I wish my recollection were perfect. At</p> <p>18 this time I can say I believe that I only worked</p> <p>19 with Mathieson Moyski one year.</p> <p>20 Q. Well, you left in May of '14 so fiscal</p> <p>21 year '14 wouldn't have been finished at that point?</p> <p>22 A. Correct.</p> <p>23 Q. It would have been the fiscal year '13</p> <p>24 audit?</p>

Page 74

1 A. I do not.

2 Q. And then the next -- so that was the

3 2011. That was the --

4 MR. HOFFMAN: 2011.

5 MR. KALTENBACH: Did I skip -- did I flip

6 over by mistake. I'm sorry. That was 2011.

7 BY MR. KALTENBACH:

8 Q. The next one and I believe the final one

9 in this exhibit is the June 13, 2012, memorandum,

10 and that is on Page 271, correct, sir?

11 A. Correct.

12 Q. And this is a memorandum someone in your

13 office created, you reviewed and approved, and then

14 had sent onto Mr. Healy?

15 A. Yes.

16 Q. And it's the same five positions again,

17 right?

18 A. Correct.

19 Q. And 75 percent of the database

20 administrator and 15 percent of the accounting

21 manager?

22 A. Correct.

23 Q. And, again, you are not sure why it's

24 stated 15 percent in particular?

Page 75

1 A. Correct.

2 Q. And then the next several pages, are

3 those just salaries of the individuals in the memo?

4 A. Yes.

5 MR. HOFFMAN: Just a CDW invoice.

6 MR. KALTENBACH: Yes, I'm sorry.

7 BY MR. KALTENBACH:

8 Q. And the last page we have another CDW-G

9 which looks like it stands for CDW government

10 invoice, correct, sir?

11 A. Correct.

12 Q. Now, that we have -- and we're going to

13 review one more after we come back. Now that we

14 have kind of gone through this entire packet year by

15 year, has it refreshed your recollection or jogged

16 your memory at all about any other discussions you

17 may have had regarding the subject matter of these

18 memos with anyone that we haven't already covered?

19 A. It has not refreshed. This, as you can

20 see, was a fairly automatic process.

21 MR. KALTENBACH: Okay. Fair enough. Why

22 don't we take a short break.

23 (Whereupon, a break in the

24 proceedings was taken.)

Page 76

1 MR. KALTENBACH: Let's mark this as I

2 think it's going to Sellers No. 2.

3 (Document marked as Deposition

4 Exhibit No. 2.)

5 BY MR. KALTENBACH:

6 Q. Mr. Sellers, the last memo that we saw in

7 this packet was in 2012, June 13 of 2012. So now

8 Sellers 2, is this the next memo that you would have

9 created for 2013?

10 A. Yes.

11 Q. So, this is a document, as with the prior

12 ones, someone in your office created and you

13 reviewed and approved, correct?

14 A. Correct.

15 Q. It has the same five positions again,

16 correct, sir?

17 A. Correct.

18 Q. And it's the same percentage that we have

19 been looking at, 75 percent and 15 percent, correct,

20 for the two positions?

21 A. Correct.

22 Q. Okay. If we flip back to the prior

23 year's memo, sir, so comparing it to Conway Exhibit

24 Number 3, Page 271, which is the June 13, 2012,

Page 77

1 memo, it looks like the same memo, the same cover

2 memo just with a new date, right?

3 A. Yes.

4 Q. So let's now turn back to Page 265, which

5 is the June 1st, 2011, memo, and this is the memo --

6 do you recall, sir, this is where for some reason

7 your title and Mr. Healy's title were added to the

8 memo?

9 A. Yes.

10 Q. There's another change -- well, there's

11 not another change in this one. But the first line

12 of the memo states, "following as is a list of

13 responsibilities that District 204 proposes become

14 the direct costs of the Lyons Township treasurer's

15 office."

16 Do you see that, sir?

17 A. Yes.

18 Q. Flipping to the June 13, 2012, memo, that

19 first line changes, does it not?

20 A. Yes.

21 Q. The word "proposes" is gone, right?

22 A. Yes.

23 Q. The June 2012 memo just says "following

24 is a list of District 204 responsibilities that are

EXHIBIT 15

1 **IN THE CIRCUIT COURT OF COOK COUNTY**
 2 **COUNTY DEPARTMENT, CHANCERY DIVISION**

3 TOWNSHIP TRUSTEES OF)
 4 SCHOOLS TOWNSHIP 38 NORTH,)
 RANGE 12 EAST,)
)
 5 Plaintiff,) NO. 13-CH-23386
) Hon. Sophia H. Hall
 6 vs.)
)
 7 LYONS TOWNSHIP HIGH SCHOOL)
 DISTRICT 204,)
 8)
 Defendant.)

9
 10 DISCOVERY DEPOSITION

11 Discovery deposition of **ROBERT HEALY**, taken
 12 at the instance of the Defendant on
 13 November 14, 2016, commencing at 1:37 p.m. at
 14 Taylorville Correctional Center, 1144 Illinois Route
 15 29, Taylorville, Illinois, before Angela C. Turner, a
 16 Certified Shorthand Reporter, pursuant to notice and
 17 the stipulation attached hereto.

18
 19
 20
 21 **DAVIS REPORTING SERVICE**
 Angela C. Turner, CSR #084-004122
 22 Certified Shorthand Reporters
 3 Hickory Hills Drive
 23 Springfield, Illinois 62707
 (217) 546-6868
 24

A P P E A R A N C E S

Barry P. Kaltenbach
Gretchen M. Kubasiak
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Telephone: (312) 460-4200

(Appearing on behalf of the Plaintiff)

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20 N. Clark St., Suite 2500
Chicago, Illinois 60602
Telephone: (312) 899-0899

(Appearing on behalf of the Defendant)

I N D E X

	<u>Page</u>
ROBERT HEALY	
Examination by Mr. Hoffman	5
Examination by Mr. Kaltenbach	76
Examination by Mr. Hoffman	110

E X H I B I T S

<u>No.</u>	<u>Page</u>
Healy Exhibit 1	8
Healy Exhibit 2	70
Healy Exhibit 3	70
Healy Exhibit 4	96
Healy Exhibit 5	101
Healy Exhibit 6	105
Healy Exhibit 7	108

S T I P U L A T I O N

It is stipulated and agreed, by and between the parties hereto, through their attorneys, that the deposition of **ROBERT HEALY** may be taken for discovery purposes before Angela C. Turner, a Certified Shorthand Reporter, upon oral interrogatories, on November 14, 2016, A.D., at the instance of the Defendant, commencing at 1:37 p.m. at Taylorville Correctional Center, 1144 Illinois Route 29, Taylorville, Illinois;

That the oral interrogatories and the answers of the witness may be taken down in shorthand by the Reporter and afterwards transcribed;

That all requirements of the Civil Practice Act and the Rules of the Supreme Court as to dedimus, are expressly waived;

That the witness does not waive signature and shall read and sign this deposition before a notary public;

That any objections as to competency, materiality or relevancy are hereby reserved, but any objection as to the form of the question is waived unless specifically noted;

That the deposition or any parts thereof may be used for any purpose for which discovery depositions are competent, by any of the parties hereto, without foundation proof;

That any party hereto may be furnished copies of the deposition at his or her own expense.

TRANSCRIPT OF DEPOSITION

(Whereupon the witness was sworn by the court reporter.)

ROBERT HEALY

called as a witness herein, at the instance of the Defendant, having been first duly sworn on his oath, was examined and testified as follows:

EXAMINATION

BY MR. HOFFMAN:

Q. Would you please state your full name for the record, sir?

A. Robert Healy, H-E-A-L-Y.

Q. Sir, my name is Jay Hoffman. I am the attorney for Lyons Township High School District 204. I issued a subpoena to you in connection with a civil lawsuit in which the Township Trustee of Schools sued Lyons Township High School for various amounts of money on various issues.

As I told you earlier, when we first spoke, you are not a party to this lawsuit nor is there any reason to believe that you would ever be a party to this lawsuit. But because you were there at the time and authored or received a lot of the documents that are important to our case, I want to ask you

1 MR. HOFFMAN: Well, right now I'm okay,
2 because I haven't been drinking any water. We can
3 certainly arrange a washroom break.

4 THE DEPONENT: What about you guys? Am I
5 the only one?

6 MR. HOFFMAN: You're the star of the show.

7 MR. KALTENBACH: I would use one if you took
8 one.

9 MR. HOFFMAN: We will take a bio break.

10 (Break taken.)

11 Q. (By Mr. Hoffman) So Mr. Healy, I would like
12 to switch over to the issue of quarterly distribution
13 of interest earned on the investments.

14 For the record, we have just taken a
15 ten-minute break. So we will include that in our
16 time calculations.

17 Sir, can you tell me about the investments
18 that you and your office made on behalf of LT and the
19 other school districts of their school funds?

20 A. It's the treasurer's job to invest the
21 money. So basically, the money is pooled. So each
22 school district has a separate -- we're going to talk
23 total fund balances and not break it down, but
24 individual. So let's talk about 14 fund balances

1 combined. And then you understand what a proportion
2 is? It's pretty basic.

3 Q. Yes, sir.

4 A. You would own a certain percentage of that
5 combined assets. Investment pool.

6 Q. So tell me how --

7 A. Each quarter. Keep track of the interest
8 paid for that quarter. And actually, I often
9 estimated the value, estimated the income, because
10 the actual numbers weren't readily available.

11 Q. Why was that?

12 A. To distribute income.

13 Q. I'm sorry.

14 A. Paid interest four times a year.

15 Q. Why were the numbers not readily available?

16 A. The sheets -- it's a lot of money. And we
17 didn't have -- I could pretty much judge what was
18 made in my head. And then I would make a
19 conservative estimate for the first three periods of
20 the fiscal year; and then at the end, the fourth was
21 usually a large payment.

22 Q. Is the fourth payment --

23 A. Where I would get as close to actual as
24 possible.

1 Q. That was at the end of the fiscal year,
2 around June?

3 A. Ending June 30th.

4 Q. And did anyone help you with those estimates
5 or help you to determine --

6 A. No.

7 Q. Okay. Who is Cheryl?

8 A. Cheryl Sudd?

9 Q. Yes. She was the outside accountant, right?

10 A. She was our bookkeeper that went back and
11 reconciled and checked all the investment
12 transactions to make sure that all income and few
13 losses were properly recorded. She kept books. She
14 kept a set of books on the stuff.

15 Q. So you were the person, as the treasurer,
16 who made the decision as to how much each quarter
17 would be paid out to the districts?

18 A. Yes.

19 Q. And then how did you determine the
20 proportionate amounts?

21 A. Well, it's just a simple mathematical
22 formula. You get a total. We had them in the last
23 set of documents.

24 Q. Sure. No, I understand.

1 But where does that percentage number come
2 from?

3 A. Oh, their fund balance -- recap of their
4 fund balances for each month, at the end of the
5 month.

6 Q. And so is that -- is the percentage you
7 would pay to each district on a quarterly basis, is
8 that percentage based on an average of the three
9 months in the quarter?

10 A. No. They were the actual fund balance
11 amounts at the end.

12 Q. At the end of each quarter?

13 A. At the end of each month. And then we get
14 an average for the quarter. So January, February,
15 March, we were getting average of those, the ending
16 month balance. So it would be an average of their
17 fund balances for the month. That would be used to
18 get a percentage to break that interest down, the
19 interest distribution down.

20 Q. Okay. I understand.

21 So are you familiar with -- tell me what the
22 general ledger was at the trustees.

23 A. Cheryl was responsible for, actually, the
24 bulk of the general ledger. And her books. It was

1 more or less between Cheryl and the auditors.

2 Q. That's Baker Tilly?

3 A. Yeah.

4 Q. And they were the ones who compiled the
5 information and --

6 A. Final draft of all our official numbers.

7 Q. And that was kept on a computer. Am I
8 correct?

9 A. I assume.

10 Q. Okay.

11 A. We had to have a computer. Even Cheryl had
12 a computer. She sent all her stuff over to us, which
13 we put somewhere.

14 Q. Let's start with --

15 A. In the basement. I don't remember.

16 Q. We have got two folders with your files. I
17 am going to start with a document -- I'm sorry. Let
18 me start over.

19 I have got a file folder that we previously
20 marked as Bradshaw Exhibit Number 6. And it's
21 entitled Healy Quarterly Interest Sheets, Number 2.
22 And it's for the years 2000 to 2012.

23 And so these are copies of what we were told
24 were your handwritten records of quarterly interest

1 distributions. And somebody else went and wrote in
2 pen in the upper right-hand corner the period to
3 which they apply.

4 A. Yes.

5 Q. So take a look at these sets of records and
6 tell me if you recognize them and if they are what I
7 was told they were.

8 A. It looks like my stuff. Yes, looks like
9 mine. Specifically what it is, I'm not sure.

10 Q. Let me direct your attention to a couple of
11 these pages.

12 A. That would be -- looks like when I was
13 trying to figure out our ending distribution interest
14 for a certain period.

15 Q. And would this be June 2000 based on what it
16 says at the bottom, June '00?

17 A. Yeah, I would assume.

18 MR. KALTENBACH: That's the first stapled
19 packet?

20 MR. HOFFMAN: Right. They're not bated
21 stamped, so we will have to do our best.

22 THE DEPONENT: That's fine.

23 Q. (By Mr. Hoffman) The next page lists Dean
24 Witter, American something.

1 A. American Funds, Franklin, Kemper, Lord
2 Abbett --

3 Q. And are those some of the places where --

4 A. Some of the places we had funds. These
5 would have been interest income numbers at the end of
6 the year distribution.

7 Q. Why were the numbers that you used always
8 round numbers?

9 A. Well, again, this would have been an
10 estimate. I -- we did the interest distribution, I
11 would say I think it was in July. The end of the
12 year was our fourth and final distribution of
13 interest. So I kind of estimated the first three.
14 Get a good ball park.

15 Q. Okay.

16 A. And I held certain ones until the end of the
17 year to realize income from them. Realized income,
18 meaning I waited to the end of the year to see what
19 they were worth. This is a game, by the way.

20 Q. By the end of the year, was it your practice
21 to pay out every dollar and penny of the amount that
22 was earned?

23 A. No. As you can see, they were rounded
24 numbers.

1 Q. Why was that so?

2 A. Well, because then Cheryl would go back and
3 do an exact penny as to the amounts earned. I would
4 say I would just use a round number. I didn't care
5 so much about the pennies.

6 Q. Even for the fourth quarter, in June?

7 A. Yeah.

8 This is a conservative number. The money on
9 these books were left in there was much more than
10 this.

11 Q. So how did Cheryl's work at year-end for
12 investments differ from your estimates at year-end?

13 A. Hers would carry it forward to the exact
14 pennies. Exact pennies, I mean, you know, not
15 568,000; it would be \$569,329.16.

16 Q. What documents did you or --

17 A. This is more expeditious to do this. I'm
18 the bigger ball picture. She would go and dot the
19 I's and cross the T's.

20 Q. The actual check that was cut to each of the
21 districts, would the amounts be stated --

22 A. It wasn't an actual check.

23 Q. Or credit.

24 A. Interest distribution on their financial

1 statements.

2 Q. You didn't send them the actual money?

3 A. I didn't send them a check.

4 Q. Their money was kept with you anyway to pay
5 their bills, right?

6 A. Right.

7 Q. So the actual -- what should we call that --
8 the actual posting of interest paid to them, were the
9 accurate numbers stated in the general ledger that
10 Cheryl maintained or the actual numbers and accurate
11 numbers stated in your files?

12 A. The actual numbers would have been in
13 Cheryl's. My distribution numbers were as a
14 reasonable estimate by me of what was available to be
15 distributed.

16 Q. That applies to this whole set of documents
17 that we're talking about right in front of you, yes,
18 correct?

19 A. My numbers concerned -- I would have said --
20 I would have left -- I would have picked up this
21 number here, 400,000. I would have left the 41,000
22 in the bank even at the end of the month.

23 Q. So if anybody wanted to find the actual --
24 if anybody wanted to figure out how much actually

1 should have been paid or credited to each district,
2 they would look at the general ledger and not at your
3 files, correct?

4 A. Can you repeat that?

5 MR. HOFFMAN: Can you read that back?

6 (The requested portion of the
7 record was read by the Court
8 Reporter.)

9 THE DEPONENT: If you wanted an exact
10 number.

11 Q. (By Mr. Hoffman) Right. Let's assume that
12 we do want an exact number.

13 A. You would have to use Cheryl's exact
14 numbers.

15 I think that my numbers were a reasonable
16 estimate of what was made.

17 Q. And that's a reasonable estimate --

18 A. Reasonable, if not conservative number, as
19 to the rate of return on investment.

20 Q. And that's for all four of the quarters that
21 were involved, correct?

22 A. Yes.

23 Q. Now, let me ask you --

24 A. Are you also -- if I didn't pick this, let's

1 say, this 41,000 here, the remainder, that would have
2 been picked up the following year. It wasn't like I
3 kept it. It was just, you know, it would go into
4 next year's pool of interest.

5 Q. Where were the records kept that actually
6 showed the source documents for Dean Witter and other
7 accounts?

8 A. They were all kept by -- they were filed by
9 banking institutions. Dean Witter was all together
10 when I left. American Funds was all together.
11 Franklin. We sent Cheryl monthly copies of these to
12 keep her up to date. And after Cheryl left, it went
13 to that Bradshaw lady, who was Cheryl's friend.

14 Q. That's Kelly Bradshaw?

15 A. Yeah, I think so. She was part-time right
16 about the time I left.

17 Q. Do you have any thoughts -- how was she?
18 You worked with her for --

19 A. Bitch.

20 Q. Say that again.

21 A. She was a little bit difficult to work with.

22 Q. How was the quality of her work, putting
23 aside her demeanor and temperament?

24 A. If you get past her temperament, she was

1 fine. Cheryl was a lot easier to work with.

2 Q. Okay.

3 A. Cheryl was actually one of our auditors.

4 When she left, she came back to work for us part-time
5 doing the reconciliation of books. And also --

6 Q. She had been with Gurrie?

7 A. Yeah.

8 Q. And then came to work part-time?

9 A. She left Gurrie and she went somewhere else
10 and worked for us part-time. Gurrie -- it's just
11 coming back to me. I haven't thought of it in
12 20 years. Gurrie wanted this, because I couldn't
13 adequately keep track of all this, all this stuff.

14 Q. Why was that?

15 A. It was too big. You know, when I left, it
16 was -- I don't know. You guys probably know better
17 than I do -- 400 million a year.

18 Q. And why did you have difficulty keeping
19 track of that?

20 A. Because there was multiple accounts. There
21 was a lot of volume. Lot of transactions.

22 Q. And --

23 A. And also, if I may interpret you before we
24 go too far.

1 Gurrie, our auditors, suggested it would be
2 a good idea to have somebody else do the books, aside
3 from me, as a double check on my numbers. So if I
4 picked up something, maybe they would -- Cheryl would
5 go in and reconcile it to the exact cash number in
6 the banks. We dealt with numerous banks.

7 Q. Why wasn't there -- I haven't seen a
8 document for the 1995 to 2012 period that was just a
9 comprehensive listing of all of the investments, the
10 rates of return.

11 Were there such things?

12 A. Sure. In fact, ask LT. I used to send them
13 a monthly report, investment report, if I'm not
14 mistaken.

15 Q. What did that investment report that you
16 sent out to LT have on it?

17 A. It was more toward the end of my time there.
18 It was -- oh, my God.

19 Q. Was that when David Sellers was asking
20 for --

21 A. Yeah, Sellers.

22 Q. Sellers was asking for more information on
23 investments?

24 A. We gave it to him monthly.

1 Q. Okay.

2 A. It was a breakdown of everything we had.

3 Q. Did you ever --

4 A. It was off the list of the actual
5 instruments, not only by institution, but by item.
6 It led to. They wanted more and we gave them more.
7 Kind of a pain.

8 Q. Was there ever a time where you paid either
9 LT or any other district more than they were entitled
10 to get of their investment income?

11 A. I do not think -- I do not recall doing
12 that.

13 Q. Was there ever a time where there was an
14 accidental overpayment to all of the districts,
15 possibly in 2007?

16 A. Might have been. If I had my income
17 estimate was wrong, it would have happened. But I
18 would have to have made up for it in the future.

19 Q. And when you say "made up for it," you mean
20 by reducing the interest payment in subsequent years?

21 A. Right. In other words, they got money
22 early. That's how you look at it.

23 Q. In that type of instance, would that be an
24 overpayment that would have been made across the

1 board to all of the districts?

2 A. Yes, I would assume so. Because we paid out
3 according to that distribution.

4 Q. Right.

5 Because if the income number was incorrect,
6 that was a collective or pooled income for all the
7 districts, right?

8 A. Yeah.

9 Q. Now, so let me take a look at this very
10 first -- this document, which is labeled QDI or
11 Quarterly Distribution of Income, October 2000, for
12 the months July, August, September 2000.PDF. And
13 it's got a series of districts down in the left-hand
14 column.

15 A. Yeah, I know what it is.

16 Q. And it's got a quarterly average of the fund
17 balance. And then it's got an interest amount.

18 A. Right.

19 Q. And so am I correct that, for this quarter,
20 there was an amount of \$1 million paid out in
21 interest to all the districts?

22 A. Yes.

23 Q. And it was divided up by proportionate
24 amount to the various districts?

1 A. Right.

2 Q. So under District 204, which is LT, it has a
3 figure of \$215,254, correct?

4 A. Right.

5 Q. Is that -- would that be the amount that was
6 actually paid to them or would the amount that was
7 actually paid to them during this quarter be a
8 slightly different amount based on Cheryl's work?

9 A. This would be the amount paid to them.

10 Q. And why do you know that this was -- this
11 was the amount that was -- when we say "paid to
12 them," obviously we're talking about credit to their
13 account, right?

14 A. Yeah.

15 Q. So why do you feel confident that the amount
16 of interest earned by District 204 for this
17 particular quarter was 215,254?

18 A. Well, I'm assuming normal procedures, the
19 way we did it.

20 Q. Now, can you cross reference this and show
21 me how you would do that by the documents which are
22 Bradshaw Exhibit Number 7, which are called C-5-1510
23 G/L reports or general ledger reports?

24 Are you familiar with the reports that are

1 A. I shouldn't use this word, but I am not the
2 bullshit artist that a lot of these school people
3 are. No offense here. That's what my father would
4 say.

5 Q. Mr. Healy, we were looking -- I'm not going
6 to pull them back out again -- but you recall there
7 were two of these folders that had a bunch of your
8 handwritten notes and calculations.

9 A. Yeah.

10 Q. Were those, to the best of your knowledge,
11 were those accurate when you prepared them?

12 A. Yes.

13 Q. Did you prepare those in the ordinary course
14 of your business?

15 A. Yes.

16 Q. And was it in the ordinary course of your
17 office to keep records such as that?

18 A. They're out there somewhere. I never threw
19 them away.

20 Q. Because we have them here.

21 A. Yeah.

22 Q. That is to say it was office policy that you
23 create records like that, correct?

24 A. Oh, yeah. I kept them filed quarterly.

1 Each quarter, separate file.

2 Q. At the time that you created those records,
3 was the information that you are writing down, is
4 that fresh in your mind or were you looking at
5 something when you did it?

6 A. To the best of my knowledge, yes.

7 Q. And you --

8 A. I mean, I tried to do the best job I could.
9 I didn't just make stuff up. I'm just telling you.

10 Q. I am not accusing you of doing that.
11 There's some specific legal questions that I am
12 trying to figure out.

13 A. All right.

14 Q. When you were making these records -- you
15 had, at that time, you had personal knowledge of the
16 numbers you were writing down, correct?

17 A. Yes, sir.

18 Q. And the general ledger printouts that we
19 looked at, it was the treasurer's office, they have a
20 general ledger system, it was their policy to keep
21 that general ledger in the ordinary course of the
22 treasurer's business, correct?

23 A. Yes.

24 Q. In fact, the general ledger was kept in the

1 ordinary course of the treasurer's business, correct?

2 A. Yes.

3 Q. When entries are made into the general
4 ledger, are they made by people that have knowledge
5 of what those entries are?

6 A. Sure.

7 Q. Are they made by those people at or about
8 the time -- do they make the entries at or about the
9 time that they're receiving the data that's being
10 entered?

11 A. Yes. A day or so.

12 Q. Okay. Fair enough.

13 MR. KALTENBACH: I think I can cut through a
14 lot of these as you covered a lot of them.

15 MR. HOFFMAN: Good.

16 THE DEPONENT: I hate you guys driving home
17 so late.

18 MR. HOFFMAN: That's all right.

19 MR. KALTENBACH: I had to do the same thing
20 in Muskegon, Michigan.

21 (Whereupon said document was duly
22 marked for purposes of
23 identification as Healy Exhibit 4,
24 as of this date.)

EXHIBIT 16

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)
TOWNSHIP 38 NORTH, RANGE 12)
EAST,)

Plaintiff,)

vs.)

LYONS TOWNSHIP HIGH SCHOOL)
DISTRICT NO. 204,)

Defendant.)

No. 13 CH 23386

Judge Sophia H. Hall
Calendar 14

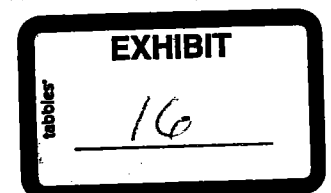
JAMES P. MARTIN'S AFFIDAVIT

James P. Martin, being first duly sworn, deposes and states as follows:

1. I am over the age of 18; I have personal knowledge of the facts set forth in this Affidavit; and if called as a witness, I could testify competently to the facts set forth in this Affidavit.

2. I am a Managing Director of Cendrowski Corporate Advisors LLC, and I was previously retained as an expert witness by the Plaintiff in this case. I am a Certified Management Accountant, a Certified Internal Auditor, and a Certified Fraud Examiner. I received my Bachelor of Arts in Accounting and my Master of Science in Accounting Information Systems from Eastern Michigan University.

3. On or about March 15, 2017, it is my understanding that Plaintiff ("TTO"), by its counsel, filed the following in this case: "Plaintiff's Rule 213(f)(3) Expert Disclosure – James P. Martin." That expert disclosure is attached hereto as Exhibit A. On March 30, 2017, counsel for the Defendant ("LT") deposed me. Certain information in the attached Expert Disclosure was not



completely reviewed by counsel for LT at my deposition, and therefore, this Affidavit is needed, and is in support of the Plaintiff's Motion for Partial Summary Judgment on the Over-Allocation of Investment Income to the Defendant.

4. I reviewed numerous documents in this case, and the documents reviewed by me and my colleagues are identified in Exhibit 1 to the Expert Disclosure, and they reveal the following:

a. During the relevant period of time, which includes the years 1995 through 2012, the Treasurer of the TTO collected property taxes and other revenue from the school districts within Lyons Township, and those revenues were pooled and invested. The investment income earned from these investments was collected in a fiduciary fund held by the Treasurer.

b. The Treasurer maintained a general ledger for each district within Lyons Township, and this general ledger tracked each district's fund balances for certain types of transactions (*e.g.*, transportation, education, and other similar transactions).

c. The pooled investments were owned in total by the underlying districts. Each district owned a pro-rata share of the pool based on their respective individual fund balance. The Treasurer calculated and tracked each district's relative proportional ownership of the pool on a quarterly basis.

d. The investment income earned on the investment pool was also owned by the underlying districts in the same proportion as the investments themselves. Allocations of investment income earned would need to be made based on this ownership proportion to correctly distribute the income.

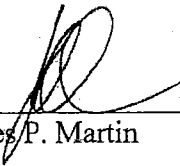
e. The Treasurer, on a quarterly basis, estimated the investment income that had been earned on the investments and used this estimate as the amount of interest to be allocated during

that period. The Treasurer then calculated the proportional share that was to be allocated to each district based on each district's relative ownership of the investment pool. In certain periods, however, the amount of interest income actually allocated to LT was different than the amount of income calculated based on LT's proportional ownership of the investment pool.

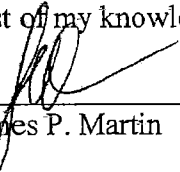
5. I also reviewed an analysis report entitled "Interest Allocation 2.xls (produced 2/19/2016)" prepared by Kelly Bradshaw, an accountant who worked for TTO. A copy is attached as Exhibit B. In reviewing the general ledger for LT which Ms. Bradshaw used to prepare her report, I determined that certain entries from the general ledger that she included as investment income allocations to LT should not have been included. Therefore, I prepared a document, which was Exhibit 7 to my deposition, entitled "District 204, Interest Allocation Analysis, Summary of Differences by Fiscal Year." A copy of my Exhibit 7 from my deposition is attached hereto as Exhibit C.

6. In reviewing the general ledger for LT, I concluded that three entries in the Bradshaw report should be modified. First, the entry for 6-30-06 should be \$569,952. Second, the entry for 1-31-05 should be \$207,601. Third, the entry for 6-30-04 should be \$147,979. These differences from Ms. Bradshaw's report are, in my opinion, appropriate when determining whether there was an over-allocation of investment interest to LT. Because of these three changes, the summaries for fiscal year 2005 and fiscal year 2006 necessarily change, as reflected on the first page of Exhibit C to this Affidavit. As a result of the changes for fiscal year 2005 and fiscal year 2006, my opinion, as set forth on the first page of Exhibit C to this Affidavit, is that \$1,427,442.04 of investment income was over-allocated to LT.

Further Affiant sayeth not.


James P. Martin

Under Penalties of perjury as provided for in Section 1-007 of the Illinois Code of Civil Procedure, I verify that the statements set forth in this Affidavit are true and correct to the best of my knowledge and belief.


James P. Martin

Dated: July 12, 2017

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12
EAST,

Plaintiff,

vs.

LYONS TOWNSHIP HIGH SCHOOL
DISTRICT NO. 204

Defendants

No. 13-CH 23386

Judge Sophia H. Hall
Calendar 14

PLAINTIFF'S RULE 213(f)(3) EXPERT DISCLOSURE – JAMES P. MARTIN

Plaintiff, Township Trustees of Schools Township 38 North, Range 12 East ("Township Trustees"), for its Rule 213(f)(3) Expert Disclosure – James P. Martin, states as follows:

1. James P. Martin, CMA, CIA, CFE

Plaintiff discloses James P. Martin of Cendrowski Corporate Advisors LLC ("Cendrowski") as an expert witness. Mr. Martin is a Managing Director at Cendrowski. In forming his opinions, Mr. Martin relied in part upon work performed by other individuals at Cendrowski. Mr. Martin is expected to testify on the subject matter of the allocation of income earned on the funds invested by the Treasurer during the relevant time period, which is fiscal year 1995 through 2012.

Mr. Martin is a Certified Management Accountant (CMA), Certified Internal Auditor (CIA) and Certified Fraud Examiner (CFA). Mr. Martin received his Bachelor of Arts in Accounting and his Master of Science in Accounting Information Systems from Eastern Michigan University. He is a former member of the Board of Governors, Detroit Chapter, of the Institute of Management Accountants and the Institute of Internal Auditors.



MARTIN
4

Mr. Martin is presently an Adjunct Professor at University of Detroit-Mercy, teaching graduate-level business courses. He has previously been Adjunct Professor at both Walsh College and the Detroit College of Business/Davenport University teaching graduate-level courses in corporate governance, managerial accounting, internal auditing, and information technology. Prior to his employment with Cendrowski, Mr. Martin worked for Deloitte & Touche, Chrysler Corporation, Electronic Data Systems and General Motors Corporation.

Mr. Martin has authored various financial industry publications, including books, articles and training materials. He has spoken before the American Institute of Certified Public Accountants, the Illinois Institute of Continuing Legal Education, and state-wide associations of certified public accounts in Michigan, Ohio, Tennessee and Minnesota.

In forming his opinions, Mr. Martin relied upon his professional education, training and experience. A list of the documents Mr. Martin reviewed in forming his opinion is attached as Exhibit 1 hereto.

Mr. Martin is expected to testify that during the relevant time period the Treasurer collected and invested revenues for the school districts. These revenues were pooled in various investment accounts, including bonds, CDs and other investments. The Treasurer maintained a summary of the investments on a ledger and later an Excel workbook. This tracking calculated a total of the investment pool (fiduciary fund). This pool would grow as revenues were collected, and shrink as amounts were expended; however, the balance was never liquidated.

The Treasurer maintained a general ledger for each district. This tracked each district's fund balances (e.g., education, transportation, *etc.*). This was used to calculate the percentage of each district's "ownership" of the fiduciary fund total. This percentage was used to calculate the districts' share of the fiduciary fund as well as to allocate investment income. Each quarter the

Treasurer estimated a total investment income amount; this amount was typically a round number. The Treasurer applied the districts' ownership percentage to the estimated investment income to determine the investment income to be ascribed to each district. This calculation of investment income was used to create a journal entry input to each district's general ledger.

Actual income (*i.e.*, income denoted on the various investment statements) was added to the fiduciary fund total when received. No formal reconciliation between the fiduciary fund and the district general ledgers appears to have been undertaken based upon the materials Mr. Martin reviewed.

The Treasurer calculated the relative percentage ownership of the fiduciary fund by the individual districts. This ownership percentage also necessarily drove the allocation of distributions of income earned on the fiduciary fund investments. Since all the funds belong to the underlying districts, any distribution of income should have been made according to these percentages.

On a quarterly basis, the Treasurer calculated the investment income amounts to be ascribed to each district using the relative percentage ownership factors. This calculation was performed on a paper ledger sheet. The calculation averaged the fund balance for the three months in the quarter; for the fourth quarter (April, May and June of a given year) the calculation averaged the first two months of the quarter (April and May).

The manual calculation of investment income allocation was input to the general ledger books of each individual district as a journal entry. Mr. Martin reviewed the Detail Statement of Fund Accounts (C-5 INT 1510) and identified that in certain quarters a different amount of interest was recorded for District 204 than was calculated on the interest distribution summary. During these same quarters, the other districts received the amount as indicated on the interest

distribution summary excepting nominal differences. Mr. Martin is expected to testify that this means that District 204 was allocated income out of proportion to the other districts. Since the districts own the entire fiduciary fund balance in their respective ownership percentages, allocations not following these percentages resulted in District 204 receiving benefit to the detriment of others.

Based upon his review and analysis, as explained above, Mr. Martin is expected to opine that during the relevant time period, District 204 was over-allocated a total of \$1,427,442.04. The breakdown of this sum is accurately reflected in the "Interest Allocation 2" workbook produced previously, with a total of six differences. The first three differences are contained on the spreadsheet entitled "Lyons Township Trustees of Schools, Interest Allocation, Compare System Reports to GL and RH calculations." These differences are (1) the entry for 6-30-06 should be \$569,952.00, (2) the entry for 1-31-05 should be \$207,601, and (3) the entry for 6-30-04 should be 147,979.00. These differences are based upon Mr. Martin's review of the underlying general ledger allocations. The next two differences are then found on the spreadsheet entitled "District 204, Interest Allocation Analysis, Summary of Differences by Fiscal Year." Because of the first three changes, the summaries for FY 2005 and FY 2006 necessarily change. The entry for FY 2005 should be \$127,611.74 and the entry for FY 2006 should be \$420,744.00. This results in the final and sixth difference, which is that the sum of the column entitled "RH Calculation vs General Ledger +/- \$1,000 per Quarter" on that summary spreadsheet should be the over allocation of \$1,427,442.04.

In forming his opinions on this matter, Mr. Martin did not assume the workbooks to be either accurate or inaccurate. His analysis does, however, confirm the correctness of the

calculations therein, by his review and interpretation of the underlying source documents described in the workbook and also described herein, except for the six differences noted above.

Mr. Martin's business address is Cendrowski Corporate Advisors LLC, 180 N. LaSalle Street, Suite 2620, Chicago, Illinois 60601 and 4111 Andover Road, West 3rd Floor, Bloomfield Hills, Michigan 48302. Cendrowski is being compensated on an hourly basis with the hourly amount dependent upon the person providing service. Mr. Martin's hourly rate is \$410. Mr. Martin did not prepare a report.

Respectfully,

TOWNSHIP TRUSTEES OF SCHOOLS
TOWNSHIP 38 NORTH, RANGE 12 EAST

By: 

One of its attorneys.

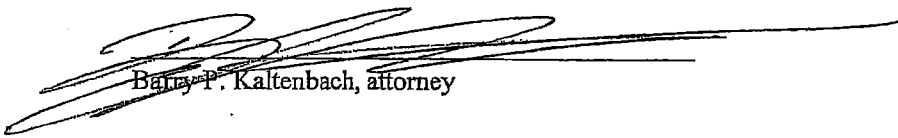
Gerald E. Kubasiak
Steven J. Rotunno
Barry P. Kaltenbach
Gretchen M. Kubasiak
Miller, Canfield, Paddock & Stone, P.L.C.
225 West Washington, Suite 2600
Chicago, Illinois 60606
(312) 460-4200
Firm No. 44233

PROOF OF SERVICE

The undersigned, an attorney, certifies that a copy of the following document:

PLAINTIFF'S RULE 213(f)(3) EXPERT DISCLOSURE – JAMES P. MARTIN has been served upon: Jay R. Hoffman, Hoffman Legal, 20 N. Clark St., Suite 2500, Chicago, IL 60602 as follows:

<input type="checkbox"/>	by personal service on March 15, 2017 before 4:00 p.m.
<input type="checkbox"/>	by U.S. mail, by placing the same in an envelope addressed to her at the above address with proper postage prepaid and depositing the same in the U.S. Postal Service collection box at 225 W. Washington Street, Chicago, Illinois, on March 15, 2017 before 4:00 p.m.
<input type="checkbox"/>	by facsimile transmission from 225 W. Washington, Chicago, Illinois to the [above stated fax number/their respective fax numbers] from my facsimile number (312) 460-4201, consisting of _____ pages on March 15, 2017 before 4:00 p.m., the served [party/parties] having consented to such service.
<input type="checkbox"/>	by Federal Express or other similar commercial carrier by depositing the same in the carrier's pick-up box or drop off with the carrier's designated contractor on March 15, 2017 before the pickup/drop-off deadline for next-day delivery, enclosed in a package, plainly addressed to the above identified individual[s] at [his/her/their] above-stated address[es], with the delivery charge fully prepaid.
<input checked="" type="checkbox"/>	by email, on March 15, 2017 before 4:00 p.m.


Barry P. Kaltenbach, attorney

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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
- Lyons Township Trustees of Schools\Productions\Initial Documents Provided on 2016-07-18
Lyons Township - IL vs Robert Healey.pdf
Lyons Township High School - Amendment to House Bill 2416.pdf
Lyons Township High School - Notice of Filing.pdf
- Lyons Township Trustees of Schools\Productions\2016-07-14 Provided on Disc
Interest Allocation 1.xlsx
Interest Allocation 2.xlsx
Interest Allocation 3.xlsx
- Lyons Township Trustees of Schools\Productions\2016-10-10 Provided by Gretchen Kubasiak
01 Plaintiffs First Production of Documents.pdf
02 Plaintiffs Second Production of Documents.pdf
03 Plaintiffs Third Production of Documents.pdf
04 Plaintiffs Fourth Production of Documents.pdf
05 Plaintiffs Fifth Production of Documents.pdf
06 Plaintiffs Sixth Production of Documents.pdf
2014-10-24 TT Amended Complaint(25769679_1).PDF
2015-04-24 204 First Amended Verified Counterclaim and NOF(25769720_1).PDF
Docs at Treasurers Office Email.pdf
Investment Summary and Portfolio.pdf
Lyons Response to Interrogatory 11.pdf
Lyons Revised Motion to Compel Production of Documents.pdf
- Lyons Township Trustees of Schools\Productions\2016-10-11 Provided by Gretchen Kubasiak
2015-05-08 204_s Responses to TTO_s First Set of Document Requests(25686622_1).PDF
Email with selected page numbers.pdf
- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD
Listing of Documents included on CD.pdf
- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\District 204 Produced Documents
District 204 Produced Documents in Response to TT's 1st Set of Document Requests.pdf
Selected - District 204 Produced Documents in Response to TT's 1st Set of Document Requests.pdf
- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Interest Income C5 - GL
204 FY1994 C5 Detail Activity 1510.pdf
204 FY1995 C5 Detail Activity 1510.pdf
204 FY1996 C5 Detail Activity 1510.pdf
204 FY1997 C5 Detail Activity 1510.pdf
204 FY1998 C5 Detail Activity 1510.pdf
204 FY1999 C5 Detail Activity 1510.pdf
204 FY2000 C5 Detail Activity 1510.pdf
204 FY2001 C5 Detail Activity 1510.pdf
204 FY2002 C5 Detail Activity 1510.pdf
204 FY2003 C5 Detail Activity 1510.pdf
204 FY2004 C5 Detail Activity 1510.pdf
204 FY2005 C5 Detail Activity 1510.pdf
204 FY2006 C5 Detail Activity 1510.pdf
204 FY2007 C5 Detail Activity 1510.pdf
204 FY2008 C5 Detail Activity 1510.pdf
204 FY2009 C5 Detail Activity 1510.pdf
204 FY2010 C5 Detail Activity 1510.pdf
204 FY2011 C5 Detail Activity 1510.pdf
204 FY2012 C5 Detail Activity 1510.pdf
- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\K. Bradshaw
Average Fund Balances.xlsx
FY2013 Interest Income Allocation.xlsx
Interest Allocation 1.xlsx
Interest Allocation 2.xlsx
Interest Allocation 3.xlsx
- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Meeting Minutes\1993 Meeting Minutes
TTO Packet 01041993.pdf
TTO Packet 02151993.pdf
TTO Packet 04051993.pdf
TTO Packet 06281993.pdf
TTO Packet 07051993.pdf
TTO Packet 07131993.pdf
TTO Packet 08311993.pdf
TTO Packet 10041993.pdf
TTO Packet 11051993.pdf
TTO Packet 12091993.pdf
- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Meeting Minutes\1994 Meeting Minutes
TTO packet 04041994.pdf
TTO Packet 06291994.pdf
TTO Packet 07111994.pdf
TTO Packet 07181994.pdf
TTO Packet 10031994.pdf
TTO Packet 10171994.pdf
TTO Packet 11221994.pdf
TTO Packet Jan 3 1994.pdf
- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Meeting Minutes\1995 Meeting Minutes

Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

TTO Packet 01091995.pdf
 TTO Packet 01131995.pdf
 TTO Packet 02271995.pdf
 TTO Packet 04031995.pdf
 TTO Packet 07281995.pdf
 TTO Packet 11091995 Notice of mtg.pdf
 TTO Packet 11091995.pdf
 TTO Packet 12121995.pdf

- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Meeting Minutes\1996 Meeting Minutes

TTO Packet 01251996.pdf
 TTO Packet 02261996.pdf
 TTO Packet 04151996.pdf
 TTO Packet 06201996.pdf
 TTO Packet 07111996.pdf
 TTO Packet 10071996.pdf
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- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Meeting Minutes\1997 Meeting Minutes

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- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Meeting Minutes\1998 Meeting Minutes

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Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

- Lyons Township Trustees of Schools\Productions\2016-10-12 Provided by Gretchen Kubasiak - CD\Township Trustees CD\Meeting Minutes\2013 Meeting Minutes

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 2013_May_7_Special_Meeting_Minutes.pdf
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 2013-28-1_Regular_Meeting_Minutes.pdf
 Board Packet February 25 2013.pdf
 Board Packet January 28 2013.pdf
 Board Packet June 17 2013.pdf
 Board Packet June 25 2013.pdf
 Board Packet March 21 2013.pdf
 Board Packet May 28 2013.pdf
 Board Packet May 7 2013.pdf
 Minutes_June_25_2013.pdf

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 REV0172.pdf
 REV0296.pdf
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 REV0300.pdf
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Quarterly Distribution of Interest - April & May - Averages.pdf
 Quarterly Distribution of Interest - April & May 1995.pdf
 Quarterly Distribution of Interest - April & May 1996.pdf
 Quarterly Distribution of Interest - April & May 1997 - Averages.pdf
 Quarterly Distribution of Interest - April & May 1997 - p2.pdf
 Quarterly Distribution of Interest - April & May 1997.pdf
 Quarterly Distribution of Interest - April & May 1998 - p2.pdf
 Quarterly Distribution of Interest - April & May 1998.pdf
 Quarterly Distribution of Interest - April & May 1999.pdf
 Quarterly Distribution of Interest - April (2) 1998.pdf
 Quarterly Distribution of Interest - April 1994 - Averages.pdf
 Quarterly Distribution of Interest - April 1994 - Fund Balance.pdf
 Quarterly Distribution of Interest - April 1994 - p2.pdf
 Quarterly Distribution of Interest - April 1994.pdf
 Quarterly Distribution of Interest - April 1995 (2).pdf
 Quarterly Distribution of Interest - April 1995.pdf
 Quarterly Distribution of Interest - April 1996 - Average Balance.pdf
 Quarterly Distribution of Interest - April 1996 - Averages - p2.pdf
 Quarterly Distribution of Interest - April 1996 - Averages.pdf
 Quarterly Distribution of Interest - April 1996 - p2.pdf
 Quarterly Distribution of Interest - April 1996.pdf
 Quarterly Distribution of Interest - April 1997 - p2.pdf
 Quarterly Distribution of Interest - April 1997.pdf
 Quarterly Distribution of Interest - April 1998 - Averages (2).pdf
 Quarterly Distribution of Interest - April 1998 - Averages -p2.pdf
 Quarterly Distribution of Interest - April 1998 - Averages.pdf
 Quarterly Distribution of Interest - April 1998 -p2.pdf
 Quarterly Distribution of Interest - April 1998.pdf
 Quarterly Distribution of Interest - April 1999 - Averages -p2.pdf
 Quarterly Distribution of Interest - April 1999 - Averages.pdf
 Quarterly Distribution of Interest - April 1999.pdf
 Quarterly Distribution of Interest - April 2000 - Averages.pdf
 Quarterly Distribution of Interest - April 2000 - Feb 2000.pdf
 Quarterly Distribution of Interest - April 2000 - Jan 2000.pdf
 Quarterly Distribution of Interest - April 2000 - March 2000.pdf
 Quarterly Distribution of Interest - April 2001 - for months Jan Feb March 2001.pdf
 Quarterly Distribution of Interest - April 2002 - for months Jan Feb March 2002.pdf
 Quarterly Distribution of Interest - April 2003.pdf
 Quarterly Distribution of Interest - April 2004 - for months Jan Feb March 2004.pdf
 Quarterly Distribution of Interest - April 2005 - for months Jan Feb March 2005.pdf
 Quarterly Distribution of Interest - April 2006 - for months Jan Feb March 2006.pdf
 Quarterly Distribution of Interest - April 2007 - for months Jan Feb March 2007.pdf
 Quarterly Distribution of Interest - April 2008 - for months Jan Feb March 2008.pdf
 Quarterly Distribution of Interest - April 2009 - for months Jan Feb March 2009.pdf
 Quarterly Distribution of Interest - April 2010 - for months Jan Feb March 2010.pdf
 Quarterly Distribution of Interest - April 2011 - for months Jan Feb March 2011.pdf
 Quarterly Distribution of Interest - April 2012 - for months Jan Feb March 2012.pdf
 Quarterly Distribution of Interest - April May June 1996.pdf
 Quarterly Distribution of Interest - Aug 1993.pdf
 Quarterly Distribution of Interest - Aug 1994 - p2.pdf
 Quarterly Distribution of Interest - Aug 1994.pdf
 Quarterly Distribution of Interest - Aug 1995 - p2.pdf
 Quarterly Distribution of Interest - Aug 1995.pdf
 Quarterly Distribution of Interest - Aug 1996 - p2.pdf
 Quarterly Distribution of Interest - Aug 1996 Fund Balances - p1.pdf
 Quarterly Distribution of Interest - Aug 1996 Fund Balances - p2.pdf
 Quarterly Distribution of Interest - Aug 1996.pdf
 Quarterly Distribution of Interest - Aug 1997 -p1.pdf
 Quarterly Distribution of Interest - Aug 1997 -p2.pdf

Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

Quarterly Distribution of Interest - Aug 1998 - p2.pdf
 Quarterly Distribution of Interest - Aug 1998.pdf
 Quarterly Distribution of Interest - August 1999 - p2.pdf
 Quarterly Distribution of Interest - August 1999.pdf
 Quarterly Distribution of Interest - Averages for months June July Aug Sept 1999 - p1.pdf
 Quarterly Distribution of Interest - Averages for months June July Aug Sept 1999 - p2.pdf
 Quarterly Distribution of Interest - Dec 1993 - p2.pdf
 Quarterly Distribution of Interest - Dec 1993 Adj JE.pdf
 Quarterly Distribution of Interest - Dec 1993.pdf
 Quarterly Distribution of Interest - Dec 1994 - Average Balance.pdf
 Quarterly Distribution of Interest - Dec 1994 - p2.pdf
 Quarterly Distribution of Interest - Dec 1994.pdf
 Quarterly Distribution of Interest - Dec 1995 - p2.pdf
 Quarterly Distribution of Interest - Dec 1995.pdf
 Quarterly Distribution of Interest - Dec 1996 - p2.pdf
 Quarterly Distribution of Interest - Dec 1996.pdf
 Quarterly Distribution of Interest - Dec 1997 - Averages (2) - p2.pdf
 Quarterly Distribution of Interest - Dec 1997 - Averages (2).pdf
 Quarterly Distribution of Interest - Dec 1997 - Averages.pdf
 Quarterly Distribution of Interest - Dec 1997 - Interest Distribution.pdf
 Quarterly Distribution of Interest - Dec 1997 - Quarterly Totals.pdf
 Quarterly Distribution of Interest - Dec 1997 - p2.pdf
 Quarterly Distribution of Interest - Dec 1997.pdf
 Quarterly Distribution of Interest - Dec 1998 - Averages - p2.pdf
 Quarterly Distribution of Interest - Dec 1998 - Averages.pdf
 Quarterly Distribution of Interest - Dec 1998 p2.pdf
 Quarterly Distribution of Interest - Dec 1998.pdf
 Quarterly Distribution of Interest - Dec 1999.pdf
 Quarterly Distribution of Interest - December 1999 - Averages - p2.pdf
 Quarterly Distribution of Interest - December 1999 - Averages.pdf
 Quarterly Distribution of Interest - Feb 1994 - p2.pdf
 Quarterly Distribution of Interest - Feb 1994.pdf
 Quarterly Distribution of Interest - Feb 1995 - p2.pdf
 Quarterly Distribution of Interest - Feb 1995.pdf
 Quarterly Distribution of Interest - Feb 1996 - p2.pdf
 Quarterly Distribution of Interest - Feb 1996.pdf
 Quarterly Distribution of Interest - Feb 1997 - p2.pdf
 Quarterly Distribution of Interest - Feb 1997.pdf
 Quarterly Distribution of Interest - Feb 1998 - p2.pdf
 Quarterly Distribution of Interest - Feb 1998.pdf
 Quarterly Distribution of Interest - Feb 1999 - p2.pdf
 Quarterly Distribution of Interest - Feb 1999.pdf
 Quarterly Distribution of Interest - Jan 1994 - p2.pdf
 Quarterly Distribution of Interest - Jan 1994 (2).pdf
 Quarterly Distribution of Interest - Jan 1994.pdf
 Quarterly Distribution of Interest - Jan 1995 - p2.pdf
 Quarterly Distribution of Interest - Jan 1995.pdf
 Quarterly Distribution of Interest - Jan 1996 - Average Balance.pdf
 Quarterly Distribution of Interest - Jan 1996 - p2.pdf
 Quarterly Distribution of Interest - Jan 1996.pdf
 Quarterly Distribution of Interest - Jan 1997 - Average Balance (2) - p2.pdf
 Quarterly Distribution of Interest - Jan 1997 - Average Balance (2).pdf
 Quarterly Distribution of Interest - Jan 1997 - Average Balance.pdf
 Quarterly Distribution of Interest - Jan 1997 - Averages - p2.pdf
 Quarterly Distribution of Interest - Jan 1997 - Averages.pdf
 Quarterly Distribution of Interest - Jan 1997 - p2.pdf
 Quarterly Distribution of Interest - Jan 1997.pdf
 Quarterly Distribution of Interest - Jan 1998 - p2.pdf
 Quarterly Distribution of Interest - Jan 1998.pdf
 Quarterly Distribution of Interest - Jan 1999 - p2.pdf
 Quarterly Distribution of Interest - Jan 1999.pdf
 Quarterly Distribution of Interest - Jan 2001 - for months Oct Nov Dec 2000.pdf
 Quarterly Distribution of Interest - Jan 2002 - for months Oct Nov Dec 2001.pdf
 Quarterly Distribution of Interest - Jan 2003 - for months Oct Nov Dec 2002.pdf
 Quarterly Distribution of Interest - Jan 2004 - for months Oct Nov Dec 2003.pdf
 Quarterly Distribution of Interest - Jan 2005 - for months Oct Nov Dec 2004.pdf
 Quarterly Distribution of Interest - Jan 2006.pdf
 Quarterly Distribution of Interest - Jan 2007 - for months Oct Nov Dec 2006.pdf
 Quarterly Distribution of Interest - Jan 2008 - for months Nov Dec Jan 2007.pdf
 Quarterly Distribution of Interest - Jan 2009 - for months Oct Nov Dec 2008.pdf
 Quarterly Distribution of Interest - Jan 2010 - for months Oct Nov Dec 2009.pdf
 Quarterly Distribution of Interest - Jan 2011 - for months Oct Nov Dec 2010.pdf
 Quarterly Distribution of Interest - Jan 2012 - for months Oct Nov Dec 2011.pdf
 Quarterly Distribution of Interest - January 1996 - Averages - p2.pdf
 Quarterly Distribution of Interest - January 1996 - Averages.pdf
 Quarterly Distribution of Interest - July 1993.pdf
 Quarterly Distribution of Interest - July 1994 - p2.pdf
 Quarterly Distribution of Interest - July 1994.pdf
 Quarterly Distribution of Interest - July 1995 - p2.pdf
 Quarterly Distribution of Interest - July 1995.pdf
 Quarterly Distribution of Interest - July 1996 - p2.pdf
 Quarterly Distribution of Interest - July 1996 Fund Balances - p2.pdf
 Quarterly Distribution of Interest - July 1996 Fund Balances.pdf
 Quarterly Distribution of Interest - July 1996.pdf
 Quarterly Distribution of Interest - July 1997 - p1.pdf
 Quarterly Distribution of Interest - July 1997 - p2.pdf
 Quarterly Distribution of Interest - July 1998 - p2.pdf

Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

Quarterly Distribution of Interest - July 1998.pdf
 Quarterly Distribution of Interest - July 1999 - p2.pdf
 Quarterly Distribution of Interest - July 1999.pdf
 Quarterly Distribution of Interest - June 1994 - p2.pdf
 Quarterly Distribution of Interest - June 1994.pdf
 Quarterly Distribution of Interest - June 1996 - Averages - p2.pdf
 Quarterly Distribution of Interest - June 1996 - Averages.pdf
 Quarterly Distribution of Interest - June 1997 - p2.pdf
 Quarterly Distribution of Interest - June 1997 (2).pdf
 Quarterly Distribution of Interest - June 1997.pdf
 Quarterly Distribution of Interest - June 1998 - Averages.pdf
 Quarterly Distribution of Interest - June 1999 - p2.pdf
 Quarterly Distribution of Interest - June 1999.pdf
 Quarterly Distribution of Interest - June 2000 - for months April May June 2000.pdf
 Quarterly Distribution of Interest - June 2000.pdf
 Quarterly Distribution of Interest - June 2001 - for months April May June 2001.pdf
 Quarterly Distribution of Interest - June 2001.pdf
 Quarterly Distribution of Interest - June 2002.pdf
 Quarterly Distribution of Interest - June 2003 - for months April May June 2003.pdf
 Quarterly Distribution of Interest - June 2004.pdf
 Quarterly Distribution of Interest - June 2005.pdf
 Quarterly Distribution of Interest - June 2006.pdf
 Quarterly Distribution of Interest - June 2007.pdf
 Quarterly Distribution of Interest - June 2008 - for months April May June 2008.pdf
 Quarterly Distribution of Interest - June 2009.pdf
 Quarterly Distribution of Interest - June 2010 - for months April May June 2010.pdf
 Quarterly Distribution of Interest - June 2011.pdf
 Quarterly Distribution of Interest - June 2012 - for months April May June 2012.pdf
 Quarterly Distribution of Interest - June 30 2005.pdf
 Quarterly Distribution of Interest - March 1994 - p2.pdf
 Quarterly Distribution of Interest - March 1994.pdf
 Quarterly Distribution of Interest - March 1995 - Average Balances.pdf
 Quarterly Distribution of Interest - March 1995 - Averages.pdf
 Quarterly Distribution of Interest - March 1995 - p2.pdf
 Quarterly Distribution of Interest - March 1995.pdf
 Quarterly Distribution of Interest - March 1996 - p2.pdf
 Quarterly Distribution of Interest - March 1996.pdf
 Quarterly Distribution of Interest - March 1997 - Average Balance.pdf
 Quarterly Distribution of Interest - March 1997 - Averages - p2.pdf
 Quarterly Distribution of Interest - March 1997 - Averages.pdf
 Quarterly Distribution of Interest - March 1997 - p2.pdf
 Quarterly Distribution of Interest - March 1997.pdf
 Quarterly Distribution of Interest - March 1998 - p2.pdf
 Quarterly Distribution of Interest - March 1998.pdf
 Quarterly Distribution of Interest - March 1999 - p2.pdf
 Quarterly Distribution of Interest - March 1999.pdf
 Quarterly Distribution of Interest - May 1994 - p2.pdf
 Quarterly Distribution of Interest - May 1994.pdf
 Quarterly Distribution of Interest - May 1995.pdf
 Quarterly Distribution of Interest - May 1996 - p2.pdf
 Quarterly Distribution of Interest - May 1996.pdf
 Quarterly Distribution of Interest - May 1997 - p2.pdf
 Quarterly Distribution of Interest - May 1997.pdf
 Quarterly Distribution of Interest - May 1998 - Averages.pdf
 Quarterly Distribution of Interest - May 1998 - p2.pdf
 Quarterly Distribution of Interest - May 1998.pdf
 Quarterly Distribution of Interest - May 1999.pdf
 Quarterly Distribution of Interest - Nov 1993 - Averages.pdf
 Quarterly Distribution of Interest - Nov 1993 - p2.pdf
 Quarterly Distribution of Interest - Nov 1993.pdf
 Quarterly Distribution of Interest - Nov 1994 - p2.pdf
 Quarterly Distribution of Interest - Nov 1994.pdf
 Quarterly Distribution of Interest - Nov 1995 - p2.pdf
 Quarterly Distribution of Interest - Nov 1995.pdf
 Quarterly Distribution of Interest - Nov 1996 - p2.pdf
 Quarterly Distribution of Interest - Nov 1996.pdf
 Quarterly Distribution of Interest - Nov 1997 - p2.pdf
 Quarterly Distribution of Interest - Nov 1997.pdf
 Quarterly Distribution of Interest - Nov 1998 - p2.pdf
 Quarterly Distribution of Interest - Nov 1998.pdf
 Quarterly Distribution of Interest - Nov 1999 p2.pdf
 Quarterly Distribution of Interest - Nov 1999.pdf
 Quarterly Distribution of Interest - Nov 2003 - for months July Aug Sept 2003.pdf
 Quarterly Distribution of Interest - Oct 1993 - p2.pdf
 Quarterly Distribution of Interest - Oct 1993.pdf
 Quarterly Distribution of Interest - Oct 1994 - p2.pdf
 Quarterly Distribution of Interest - Oct 1994.pdf
 Quarterly Distribution of Interest - Oct 1995 - Average Balance.pdf
 Quarterly Distribution of Interest - Oct 1995 - Averages - p2.pdf
 Quarterly Distribution of Interest - Oct 1995 - Averages.pdf
 Quarterly Distribution of Interest - Oct 1995 - p2.pdf
 Quarterly Distribution of Interest - Oct 1995.pdf
 Quarterly Distribution of Interest - Oct 1996 - Average Balance.pdf
 Quarterly Distribution of Interest - Oct 1996 - Averages - p2.pdf
 Quarterly Distribution of Interest - Oct 1996 - Averages (2) - p2.pdf
 Quarterly Distribution of Interest - Oct 1996 - Averages (2).pdf
 Quarterly Distribution of Interest - Oct 1996 - Averages.pdf

Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
Quarterly Distribution of Interest - Oct 1996 - p2.pdf
Quarterly Distribution of Interest - Oct 1996 Average Balance.pdf
Quarterly Distribution of Interest - Oct 1996.pdf
Quarterly Distribution of Interest - Oct 1997 - Averages -p1.pdf
Quarterly Distribution of Interest - Oct 1997 - Averages -p2.pdf
Quarterly Distribution of Interest - Oct 1997 - p2.pdf
Quarterly Distribution of Interest - Oct 1997.pdf
Quarterly Distribution of Interest - Oct 1998 - p2.pdf
Quarterly Distribution of Interest - Oct 1998 -p1.pdf
Quarterly Distribution of Interest - Oct 1998 -p2.pdf
Quarterly Distribution of Interest - Oct 1998.pdf
Quarterly Distribution of Interest - Oct 1999 - Averages.pdf
Quarterly Distribution of Interest - Oct 1999 p2.pdf
Quarterly Distribution of Interest - Oct 1999.pdf
Quarterly Distribution of Interest - Oct 2000 - for months July Aug Sept 2000.pdf
Quarterly Distribution of Interest - Oct 2001 - for months July Aug Sept 2001.pdf
Quarterly Distribution of Interest - Oct 2004 - for months July Aug Sept 2004.pdf
Quarterly Distribution of Interest - Oct 2005 - for months July Aug Sept 2005.pdf
Quarterly Distribution of Interest - Oct 2006 - for months July Aug Sept 2006.pdf
Quarterly Distribution of Interest - Oct 2007.pdf
Quarterly Distribution of Interest - Oct 2009 - for months July Aug Sept 2008.pdf
Quarterly Distribution of Interest - Oct 2009 - for months July Aug Sept 2009.pdf
Quarterly Distribution of Interest - Oct 2010 - for months July Aug Sept 2010.pdf
Quarterly Distribution of Interest - Oct 2011 - for months July Aug Sept 2011.pdf
Quarterly Distribution of Interest - October 1999 - Averages.pdf
Quarterly Distribution of Interest - Sept 1993.pdf
Quarterly Distribution of Interest - Sept 1994 - Average Balances.pdf
Quarterly Distribution of Interest - Sept 1994 - Fund Balances.pdf
Quarterly Distribution of Interest - Sept 1994 - p2.pdf
Quarterly Distribution of Interest - Sept 1994.pdf
Quarterly Distribution of Interest - Sept 1995 - p2.pdf
Quarterly Distribution of Interest - Sept 1995.pdf
Quarterly Distribution of Interest - Sept 1996 - p2.pdf
Quarterly Distribution of Interest - Sept 1996 Fund Balances - p2.pdf
Quarterly Distribution of Interest - Sept 1996 Fund Balances.pdf
Quarterly Distribution of Interest - Sept 1996.pdf
Quarterly Distribution of Interest - Sept 1997 -p1.pdf
Quarterly Distribution of Interest - Sept 1997 -p2.pdf
Quarterly Distribution of Interest - Sept 1998 - p2.pdf
Quarterly Distribution of Interest - Sept 1998.pdf
Quarterly Distribution of Interest - Sept 1999 - p2.pdf
Quarterly Distribution of Interest - Sept 1999.pdf
Quarterly Distribution of Interest - Sept 2002 - for months July Aug Sept 2002.pdf
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INVESTMENTSDEC2011.xls
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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 INVESTMENTSJAN2009.xls
 INVESTMENTSJAN2010.xls
 INVESTMENTSJAN2012.xls
 INVESTMENTSJUL2008.xls
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 INVESTMENTSJUL2010.xls
 INVESTMENTSJULY2007.xls
 INVESTMENTSJULY2011.xls
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 INVESTMENTSJUN2010.xls
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 INVESTMENTSMAR2008.xls
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 INVESTMENTSMAR2010.217.6.7.2010.xls
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 INVESTMENTSMAY2008.xls
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Lyons Township Trustees of Schools
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 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Lyons Township Trustees of Schools

Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017

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 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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 TT09860.pdf
 TT09868.pdf
 TT10276.pdf
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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TT19391.pdf
TT19412.pdf
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2010-01 Baird.pdf
2010-01 Fidelity.pdf
2010-01 Fifth Third Bank.pdf
2010-01 Fifth Third Securities.pdf
2010-01 First Tennessee FTN Financial Statement of Assets.pdf
2010-01 First Tennessee.pdf
2010-01 IIT.pdf
2010-01 Merrill.pdf
2010-01 Morgan Stanley.pdf
2010-01 Oppenheimer.pdf
2010-01 PMA Financial.pdf
2010-01 Raymond James.pdf
2010-01 State Bank of Countryside.pdf

Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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 2010-01-03 BlackRock.pdf
 2010-01-03 Franklin Templeton.pdf
 2010-01-03 MetLife Securities.pdf
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 2010-01-03 Oppenheimer Funds 2.pdf
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 2010-01-03 PIMCO.pdf
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 2010-01-06 Franklin Templeton.pdf
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 2010-01-06 Putnam.pdf
 2010-02 Baird.pdf
 2010-02 Fidelity.pdf
 2010-02 Fifth Third Bank.pdf
 2010-02 Fifth Third Securities.pdf
 2010-02 First Tennessee FTN Financial Statement of Assets.pdf
 2010-02 First Tennessee.pdf
 2010-02 IIIT.pdf
 2010-02 Merrill.pdf
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 2010-02 Oppenheimer.pdf
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 2010-04 State Bank of Countryside.pdf
 2010-04 The Illinois Fund.pdf
 2010-04-06 Lord Abbett.pdf
 2010-04-06 MetLife Securities.pdf
 2010-04-06 PIMCO.pdf
 2010-04-06 RS Investments.pdf
 2010-05 Baird.pdf
 2010-05 Fidelity.pdf
 2010-05 Fifth Third Bank.pdf
 2010-05 First Tennessee FTN Financial Statement of Assets.pdf
 2010-05 First Tennessee.pdf
 2010-05 IIIT.pdf
 2010-05 Merrill.pdf
 2010-05 Morgan Stanley Transaction Notification.pdf
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 2010-05 The Illinois Fund.pdf
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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2010-12 Morgan Stanley.pdf
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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Document Inventory as of March 13, 2017
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017

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2010-01 The Illinois Fund.pdf
2010-02 The Illinois Fund.pdf
2010-03 The Illinois Fund.pdf
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2010-01 Merrill.pdf
2010-02 Merrill.pdf

Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
2010-03 Merrill.pdf
2010-04 Merrill.pdf
2010-05 Merrill.pdf
2010-06 Merrill.pdf
TT07174.pdf
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- Lyons Township Trustees of Schools\Productions\2016-11-01 Provided by Gretchen Kubasiak - Investment Statements from TTO\2010-2011 Investment Statements\Oppenheimer
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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- Lyons Township Trustees of Schools\Productions\2016-11-01 Provided by Gretchen Kubasiak - Investment Statements from TTO\2010-2011 Investment Statements\PIMCO
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2010-02 PMA Financial.pdf
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- Lyons Township Trustees of Schools\Productions\2016-11-01 Provided by Gretchen Kubasiak - Investment Statements from TTO\2010-2011 Investment Statements\PNC
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- Lyons Township Trustees of Schools\Productions\2016-11-01 Provided by Gretchen Kubasiak - Investment Statements from TTO\2010-2011 Investment Statements\Putnam
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2010-01-06 Putnam.pdf
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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- Lyons Township Trustees of Schools\Productions\2016-11-01 Provided by Gretchen Kubasiak - Investment Statements from TTO\2010-2011 Investment Statements\Raymond James
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- Lyons Township Trustees of Schools\Productions\2016-11-01 Provided by Gretchen Kubasiak - Investment Statements from TTO\2010-2011 Investment Statements\RS
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2010-04-06 RS Investments.pdf
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- Lyons Township Trustees of Schools\Productions\2016-11-01 Provided by Gretchen Kubasiak - Investment Statements from TTO\2010-2011 Investment Statements\State Bank of Countryside
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2010-01 State Bank of Countryside.pdf
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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2010-03 Account 6460 March Accrual.pdf
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Robert Healy Deposition Transcript(27916807_1).PDF
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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Box 541 2006 - 2007 Statements 1.pdf
Box 541 2006 - 2007 Statements 2.pdf
Box 541 2006 - 2007 Statements 3.pdf
Box 541 April 2007 1 of 2.pdf
Box 541 April 2007 2 of 2.pdf
Box 541 Aug 2006 1 of 2.pdf
Box 541 Aug 2006 2 of 2.pdf
Box 541 Dec 2006 1 of 2.pdf
Box 541 Dec 2006 2 of 2.pdf
Box 541 Feb 2007 1 of 2.pdf
Box 541 Feb 2007 2 of 2.pdf
Box 541 Jan 2007 1 of 2.pdf
Box 541 Jan 2007 2 of 2.pdf
Box 541 Jan 2007 Statements.pdf
Box 541 July 2006 1 of 2.pdf
Box 541 July 2006 2 of 2.pdf
Box 541 June 2007 1 of 1.pdf
Box 541 June 2007 1 of 2.pdf
Box 541 March 2007 1 of 2.pdf
Box 541 March 2007 2 of 2.pdf
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Box 623 December 2007 1 of 4.pdf
Box 623 December 2007 2 of 4.pdf

Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017

Box 623 December 2007 3 of 4.pdf
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Box 623 February 2008 1 of 3.pdf
Box 623 February 2008 2 of 3.pdf
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Box 623 January 2008 1 of 3.pdf
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Box 623 March 2008 1 of 4.pdf
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2010 Comprehensive Annual Financial Report - 204.pdf
2011 Comprehensive Annual Financial Report - 204.pdf
Disc Inventory.pdf

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Box 541 2006 - 2007 Statements 1.pdf

Box 541 April 1999 1 of 5.pdf
Box 541 April 1999 2 of 5.pdf
Box 541 April 1999 3 of 5.pdf
Box 541 April 1999 4 of 5.pdf
Box 541 April 1999 5 of 5.pdf
Box 541 April 2007 1 of 2.pdf
Box 541 April 2007 2 of 2.pdf
Box 541 Aug 2006 1 of 2.pdf
Box 541 Aug 2006 2 of 2.pdf
Box 541 Dec 2006 1 of 2.pdf
Box 541 Dec 2006 2 of 2.pdf
Box 541 Feb 1999 1 of 1.pdf
Box 541 Feb 2007 1 of 2.pdf
Box 541 Feb 2007 2 of 2.pdf
Box 541 Jan 2007 1 of 2.pdf
Box 541 Jan 2007 2 of 2.pdf
Box 541 Jan 2007 Statements.pdf
Box 541 July 2006 1 of 2.pdf
Box 541 July 2006 2 of 2.pdf
Box 541 June 1999 1 of 4.pdf
Box 541 June 1999 2 of 4.pdf
Box 541 June 1999 3 of 4.pdf
Box 541 June 1999 4 of 4.pdf
Box 541 June 2007 1 of 1.pdf
Box 541 June 2007 1 of 2.pdf
Box 541 March 1999 1 of 2.pdf
Box 541 March 1999 2 of 2.pdf
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Box 541 May 1999 1 of 4.pdf
Box 541 May 1999 2 of 4.pdf
Box 541 May 1999 3 of 4.pdf
Box 541 May 1999 4 of 4.pdf
Box 541 Nov 2006 1 of 2.pdf
Box 541 Nov 2006 2 of 2.pdf
Box 541 Oct 2006 1 of 2.pdf
Box 541 Oct 2006 2 of 2.pdf
Box 541 Sep 2006 1 of 2.pdf
Box 541 Sep 2006 2 of 2.pdf
Box 584 FY1998 6-30-98.pdf
Box 584 FY1999.pdf
Box 584 FY2001.pdf
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Box 584 FY2006 August 2005.pdf
Box 584 FY2006 December 2005.pdf
Box 584 FY2006 February 2006.pdf
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Box 584 FY2006 July 2005.pdf
Box 584 FY2006 June 2006 1 of 2.pdf
Box 584 FY2006 June 2006 2 of 2.pdf

Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
Box 584 FY2006 March 2006.pdf
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Box 584 FY2006 November 2005.pdf
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Box 589 Aug 2003 1 of 2.pdf
Box 589 Aug 2003 2 of 2.pdf
Box 589 Dec 2003 1 of 2.pdf
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Box 589 Feb 2004 1 of 2.pdf
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Box 589 FY05 Insurance Rec 1.pdf
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Box 589 Jan 2004 2 of 2.pdf
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Box 589 Oct 2003 1 of 2.pdf
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Box 591 - FY2002 - April 2002 (1 of 3).pdf
Box 591 - FY2002 - April 2002 (2 of 3).pdf
Box 591 - FY2002 - April 2002 (3 of 3).pdf
Box 591 - FY2002 - August 2002 (1 of 3).pdf
Box 591 - FY2002 - August 2002 (2 of 3).pdf
Box 591 - FY2002 - August 2002 (3 of 3).pdf
Box 591 - FY2002 - December 2002 (1 of 3).pdf
Box 591 - FY2002 - December 2002 (2 of 3).pdf
Box 591 - FY2002 - December 2002 (3 of 3).pdf
Box 591 - FY2002 - February 2002 (1 of 4).pdf
Box 591 - FY2002 - February 2002 (2 of 4).pdf
Box 591 - FY2002 - February 2002 (3 of 4).pdf
Box 591 - FY2002 - February 2002 (4 of 4).pdf
Box 591 - FY2002 - January 2002 (1 of 3).pdf
Box 591 - FY2002 - January 2002 (2 of 3).pdf
Box 591 - FY2002 - January 2002 (3 of 3).pdf
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Box 591 - FY2002 - June 2002 (3 of 3).pdf
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Box 591 - FY2002 - November 2002 (1 of 3).pdf
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Box 591 - FY2002 - October 2002 (1 of 3).pdf
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Box 605 - FY2003 - April 2003.pdf
Box 605 - FY2003 - August 2002.pdf
Box 605 - FY2003 - December 2002.pdf
Box 605 - FY2003 - February 2003.pdf
Box 605 - FY2003 - January 2003.pdf
Box 605 - FY2003 - July 2002.pdf
Box 605 - FY2003 - June 2003 mutuals.pdf
Box 605 - FY2003 - June 2003.pdf
Box 605 - FY2003 - March 2003.pdf
Box 605 - FY2003 - May 2003.pdf
Box 605 - FY2003 - November 2002.pdf
Box 605 - FY2003 - October 2002.pdf
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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 Box 606 May 2000 1 of 2.pdf
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 Box 606 November 1999.pdf
 Box 606 October 1999.pdf
 Box 606 September 1999.pdf
 Box 620 2005 Statements 2005.pdf
 Box 620 April 2005 1 of 2.pdf
 Box 620 April 2005 2 of 2.pdf
 Box 620 August 2004.pdf
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 Box 620 September 2004.pdf
 Box 620 Statements 2005.pdf

- Lyons Township Trustees of Schools\Productions\2017-02-28 Provided by Gretchen Kubasiak\Disc 2 - Bank Rec Packets

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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document inventory as of March 13, 2017
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Misc: Reconciliations, documents from FY2002 & 2003.pdf
Monthly Medical Fund Report 7-2001 to 6-2003.pdf
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139718 Statements.pdf
147354 Statements.pdf
155578 Statements.pdf
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100102 Statements.pdf
141488 Statements.pdf
198160 Statements.pdf
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Cendrowski Corporate Advisors
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 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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- Lyons Township Trustees of Schools\Productions\2017-02-28 Provided by Gretchen Kubasiak\Disc 4 - Month End Reports - Email Attachments - LaGrange Statements\Month End Reports\Fund Summary (Summary
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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- Lyons Township Trustees of Schools\Productions\2017-02-28 Provided by Gretchen Kubasiak\Disc 4 - Month End Reports - Email Attachments - LaGrange Statements\Month End Reports\Monthly Rept Writer

APR 1996 - 204 - MONTHLY REPT WRITER (B24).pdf
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document inventory as of March 13, 2017

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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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- Lyons Township Trustees of Schools\Productions\2017-02-28 Provided by Gretchen Kubasiak\Disc 4 - Month End Reports - Email Attachments - LaGrange Statements\Month End Reports\Statement of Position

APR 1996 - 204 - STMT OF POSITION (C9).pdf
 APR 1997 - 204 - STMT OF POSITION (C9).pdf
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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

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Cendrowski Corporate Advisors
 Lyons Township Trustees of Schools
 Document Inventory as of March 13, 2017

Jun 2011 - 204 - STMT OF POSITION (C9).pdf
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Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
Sep 2010 - 204 - STMT OF POSITION (C9).pdf
Sept 2005 - 204 - STMT OF POSITION (C9).pdf
Sept 2012 - 204 - STMT OF POSITION (C9).pdf
- Lyons Township Trustees of Schools\Productions\2017-02-28 Provided by Gretchen Kubasiak\Disc 4 - Month End Reports - Email Attachments - LaGrange Statements\R. Healy Email
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2011 and 2012 statements.msg
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Bond Holding Statements.... 2008 thru 2011 (11 pgs).msg
CD Dividend Accrual Reports - Lyons.msg
CD (Holdings) Dividend Accrual Reports Dec'11 & Jan'12 - Lyons.msg
CD Update.msg
CDs & Collateral.msg
Cds in FCB..msg
Certificate Information.msg
Confirmation of CD Accounts.msg
Consolidated Performance Report from 4-18-2012.msg
Copy of Depository List 6-8-2012.xls.msg
Daily Performance Report.msg
Daily Performance.msg
Daily Portfolio Report.msg
Daily Portfolio Review.msg
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Daily report 7-2-2012.msg
Daily Report 7-28-2012.msg
Daily Report 7-31-2012.msg
Daily report 7-5-2012.msg
Daily Report 8-3-2012.msg
Daily Report and Capital Gains.msg
Daily report for July 3rd.msg
Daily report from Morgan Stanley Smith Barney.msg
Daily Report.msg
Daily report 7-30-2012.msg
Daily Reports.msg
Date holdings were Acquired.msg
Debt Service Invoices.msg
December and January Bond Holding Statements.msg
Emailing_2041BANDIPAYMENT6.12.msg
Emailing_kelly6182012.msg
FDIC CD letter - PFM.msg
FDIC Ins Coverage.msg
FDIC Insurance Coverage.msg
Feb, March, April 2012 Statements.msg
February & March 2012 statements.msg
For today's meeting.msg
FTN CD Statement and FTN Safekeeping Statement of Assets for Lyons Township School Treasurer.msg

Cendrowski Corporate Advisors
Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
FW_ (2).msg
FW_ (Copy 5).msg
FW_ Consolidated Performance Report from 4-18-2012.msg
FW_ Daily report.msg
FW_ FDIC.msg
FW_ February & March 2012 statements.msg
FW_ Healy Annuities_2.2012.xls.msg
EW_ Investment move to Morgan Stanley Smith Barney....msg
FW_ Line Item 64.msg
FW_ Performance report error.msg
FW_ Portfolio Reviews.msg
FW_ Yield information from Morgan Stanley.msg
FW_.msg
Fwd_ LTST ACH Transactions.msg
Here are your year end statements.msg
Lyons Township 12_31 Holdings 2008-2011.msg
Lyons Township Schools Holdings Report.msg
March & April statements.msg
Month End Performance Report.msg
Month ending report for April summarizing just the yield.msg
Month ending report for May.msg
Morgan Stanley Report.msg
Performance and yield in 1 report.msg
Performance report (2).msg
Performance Report 5-10-2012.msg
Performance Report for May 8th, 2012.msg
Performance Report, please call to review.msg
Performance Report.msg
Please pass the attached report on to Kelly. Thank you Roger.msg
RE_ Feb 14 maturity.msg
RE_ Requested Letter.msg
Report for 5-4-2012.msg
REPORT FOR 5-9-2012.msg
Report.msg
Reports for May 1st, 2012.msg
Safekeeping Statement of Bond Holdings.msg
School District Certificate of Deposits.msg
Statement of Assets February 2012.msg
statement.msg
Statements Lyons Township Schoolmsg
Statements 131220.msg
Statements 358-161695-241.msg
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Yield information from Morgan Stanley.msg
yield.msg
- Lyons Township Trustees of Schools\Productions\2017-03-02 Provided by Ken Getty
April 2007_20170228135810.pdf
August 2007_20170228140044.pdf
December 2006_20170302101843.pdf
December 2007_20170302102316.pdf
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June 2011_20170302140913.pdf
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Birkenmaier, Susan - Vol I(28675454_1).PDF
- Lyons Township Trustees of Schools\Productions\2017-03-08 Provided by Gretchen Kubasiak
Theissen, Michael - Vol I(28673413_1).PDF
- Lyons Township Trustees of Schools\Productions\Audit Reports from Public Website 2017-02-17
2009-06-30.pdf
2010-06-30.pdf

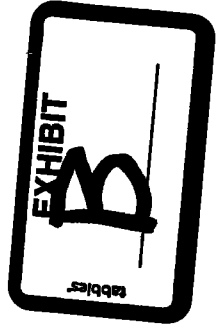
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Lyons Township Trustees of Schools
Document Inventory as of March 13, 2017
2011-06-30.pdf
2012-06-30.pdf
- Lyons Township Trustees of Schools\Productions\lyonstto.net - 2016-07-21\2015
03232015_minutes_20150508111450.pdf
10-02-2015_Approved_Special_Board_Meeting_Minutes.pdf
1-26-15_Minutes.pdf
2015-December Invest_Summary-District_w_Rtn.pdf
2015-September Invest_Summary-District.pdf
2-12-2015_Minutes.pdf
5~26~2015_Reorg_Mtg_Minutes_20150831090809.pdf
5~26~2015_Special_Mtg_Minutes_20150831090739.pdf
Agenda_August_31_2015.pdf
Agenda_December_17__2015.pdf
Agenda_February_12__2015.pdf
Agenda_Jan_26__2015.pdf
Agenda_June_25_2015.pdf
Agenda_March_23__2015.pdf
Agenda_March_9__2015.pdf
Agenda_May_2015.pdf
Agenda_May_26__2015.pdf
Agenda_November_9__2015.pdf
Agenda_October_2_2015.pdf
Agenda_Organizational_Mtg_May_26__2015.pdf
Approved_Signed_Minutes_June_25__2015.pdf
FY_final_budget_15.pdf
IMRF_Report_FY15.xlsx
June_2015_INVEST_20150911170439.pdf
Lyons_Township_School_Treasurer_14_sd_FINAL_1-12-15.pdf
lyons_township_school_treasurer_15_ip_FINAL_11-13-15.pdf
Mar_15_Invest_Summary_District.pdf
March_9__2015.pdf
Minutes_552015_20150602080107.pdf
Minutes_Signed__Approved_August_31__2015.pdf
Prevailing_Wage_Ordinance_2015_01_20150713082629.pdf
Signed_Minutes_Nov_9_2015.pdf
Signed_Open_Minutes_December_17__2015.pdf

Interest Allocation 2.xls
 Produced 2/19/2016

District 204
 Interest Allocation Analysis
 Summary of Differences by Fiscal Year

Fiscal Year	RH Calculation vs General Ledger +/- \$1,000 per Quarter	Additional Differences related to System Reports vs RH Figures used	Total by Fiscal Year
FY1995	5,000.34	10,178.51	15,178.85
FY1996		11,408.06	11,408.06
FY1997	44,903.13	48,040.21	92,943.34
FY1998	(95,052.36)	31,719.46	(63,332.90)
FY1999		23,130.73	23,130.73
FY2000	2,499.65	431.08	2,930.73
FY2001		(6,130.20)	(6,130.20)
FY2002		62,121.09	62,121.09
FY2003		1,332.70	1,332.70
FY2004		(18,233.44)	(18,233.44)
FY2005	209,239.32	(65,874.96)	143,364.36
FY2006	389,241.03	2,109.24	391,350.27
FY2007	827,163.47	(18,203.88)	808,959.59
FY2008	127,863.26	13,907.60	141,770.86
FY2009	246,711.45	(5,736.89)	240,974.56
FY2010		(108.65)	(108.65)
FY2011	(240,001.56)	4,142.83	(235,858.73)
FY2012	(40,001.08)	2,836.62	(37,164.46)
	\$ 1,477,566.65	\$ 97,070.12	\$ 1,574,636.77

As Attached
 EXHIBIT NO. 3
 10-25-16
 S. STUCKY



Lyons Township Trustees of Schools
Interest Allocation
Compare System Reports to GL and RH calculations
Selected quarters with no missing data

District	Fiscal Year	Date	204 FB per RH	Total Avg FB	Percent	FB per Reports	Total Avg FB per Reports	Percent based on Reports	Income	Calculated Interest Allocation	Calculated Interest Allocation per Reports	Allocation per TTD GL	Difference RH to TTD GL	Difference Reports to TTD GL	Difference District FB	Difference Total Avg FB	Comments	Data Available for system report compare
204	FY1995	6/30/1995	26,166,713	97,267,682	26.902%	36,166,713	96,934,350	26.994%	950,000	255,566.67	255,566.67	260,567.00	5,000.33	4,121.51	837,751.06	313,856.41		X
204	FY1995	9/30/1995	26,166,713	97,267,682	26.902%	36,166,713	96,934,350	26.994%	950,000	255,566.67	255,566.67	260,567.00	5,000.33	4,121.51	837,751.06	313,856.41		X
204	FY1995	12/31/1995	26,166,713	97,267,682	26.902%	36,166,713	96,934,350	26.994%	950,000	255,566.67	255,566.67	260,567.00	5,000.33	4,121.51	837,751.06	313,856.41		X
204	FY1996	6/30/1996	25,309,400	101,295,143	24.986%	25,309,400	101,312,772	24.981%	1,200,000	299,829.58	299,829.58	299,829.00	(0.58)	51.59	613,518.04	(9.00)		X
204	FY1996	9/30/1996	25,309,400	101,295,143	24.986%	25,309,400	101,312,772	24.981%	1,200,000	299,829.58	299,829.58	299,829.00	(0.58)	51.59	613,518.04	(9.00)		X
204	FY1996	12/31/1996	25,309,400	101,295,143	24.986%	25,309,400	101,312,772	24.981%	1,200,000	299,829.58	299,829.58	299,829.00	(0.58)	51.59	613,518.04	(9.00)		X
204	FY1997	6/30/1997	22,187,062	85,464,546	25.961%	22,187,062	85,474,534	25.958%	1,100,000	285,565.99	285,565.99	285,565.00	(0.99)	32.38	1,226,206.36	(1,720,272.85)		X
204	FY1997	9/30/1997	22,187,062	85,464,546	25.961%	22,187,062	85,474,534	25.958%	1,100,000	285,565.99	285,565.99	285,565.00	(0.99)	32.38	1,226,206.36	(1,720,272.85)		X
204	FY1997	12/31/1997	22,187,062	85,464,546	25.961%	22,187,062	85,474,534	25.958%	1,100,000	285,565.99	285,565.99	285,565.00	(0.99)	32.38	1,226,206.36	(1,720,272.85)		X
204	FY1998	6/30/1998	25,669,269	113,805,587	22.555%	25,669,269	113,805,251	22.555%	900,000	202,998.31	202,998.31	202,998.00	(0.31)	(0.91)	1,404,454.85	(361,638.83)		X
204	FY1998	9/30/1998	25,669,269	113,805,587	22.555%	25,669,269	113,805,251	22.555%	900,000	202,998.31	202,998.31	202,998.00	(0.31)	(0.91)	1,404,454.85	(361,638.83)		X
204	FY1998	12/31/1998	25,669,269	113,805,587	22.555%	25,669,269	113,805,251	22.555%	900,000	202,998.31	202,998.31	202,998.00	(0.31)	(0.91)	1,404,454.85	(361,638.83)		X
204	FY1999	6/30/1999	36,945,517	156,916,691	23.545%	36,945,517	156,917,191	23.545%	1,500,000	379,252.32	379,252.32	383,927.00	4,674.68	4,659.41	1,254,702.82	(499.97)		X
204	FY1999	9/30/1999	36,945,517	156,916,691	23.545%	36,945,517	156,917,191	23.545%	1,500,000	379,252.32	379,252.32	383,927.00	4,674.68	4,659.41	1,254,702.82	(499.97)		X
204	FY1999	12/31/1999	36,945,517	156,916,691	23.545%	36,945,517	156,917,191	23.545%	1,500,000	379,252.32	379,252.32	383,927.00	4,674.68	4,659.41	1,254,702.82	(499.97)		X
204	FY2000	6/30/2000	33,434,128	147,749,785	22.625%	33,434,128	147,749,785	22.625%	1,500,000	339,433.26	339,433.26	339,433.00	(0.26)	(0.26)	(0.01)	0.02		X
204	FY2000	9/30/2000	33,434,128	147,749,785	22.625%	33,434,128	147,749,785	22.625%	1,500,000	339,433.26	339,433.26	339,433.00	(0.26)	(0.26)	(0.01)	0.02		X
204	FY2000	12/31/2000	33,434,128	147,749,785	22.625%	33,434,128	147,749,785	22.625%	1,500,000	339,433.26	339,433.26	339,433.00	(0.26)	(0.26)	(0.01)	0.02		X
204	FY2001	6/30/2001	33,917,420	150,007,615	22.610%	33,917,420	148,001,287	22.917%	2,000,000	452,209.31	452,209.31	452,209.00	(0.31)	(6,130.68)	2,872,988.47	5,057,128.41		X
204	FY2001	9/30/2001	33,917,420	150,007,615	22.610%	33,917,420	148,001,287	22.917%	2,000,000	452,209.31	452,209.31	452,209.00	(0.31)	(6,130.68)	2,872,988.47	5,057,128.41		X
204	FY2001	12/31/2001	33,917,420	150,007,615	22.610%	33,917,420	148,001,287	22.917%	2,000,000	452,209.31	452,209.31	452,209.00	(0.31)	(6,130.68)	2,872,988.47	5,057,128.41		X
204	FY2002	6/30/2002	36,369,628	162,899,243	23.366%	36,369,628	162,899,243	23.366%	3,750,000	837,242.10	837,242.10	837,242.00	(0.10)	(86.15)	(499.73)	14,502.20		X
204	FY2002	9/30/2002	36,369,628	162,899,243	23.366%	36,369,628	162,899,243	23.366%	3,750,000	837,242.10	837,242.10	837,242.00	(0.10)	(86.15)	(499.73)	14,502.20		X
204	FY2002	12/31/2002	36,369,628	162,899,243	23.366%	36,369,628	162,899,243	23.366%	3,750,000	837,242.10	837,242.10	837,242.00	(0.10)	(86.15)	(499.73)	14,502.20		X
204	FY2003	6/30/2003	36,369,628	162,899,243	23.366%	36,369,628	162,899,243	23.366%	3,750,000	837,242.10	837,242.10	837,242.00	(0.10)	(86.15)	(499.73)	14,502.20		X
204	FY2003	9/30/2003	36,369,628	162,899,243	23.366%	36,369,628	162,899,243	23.366%	3,750,000	837,242.10	837,242.10	837,242.00	(0.10)	(86.15)	(499.73)	14,502.20		X
204	FY2003	12/31/2003	36,369,628	162,899,243	23.366%	36,369,628	162,899,243	23.366%	3,750,000	837,242.10	837,242.10	837,242.00	(0.10)	(86.15)	(499.73)	14,502.20		X
204	FY2004	6/30/2004	39,644,793	169,602,406	23.377%	39,644,793	169,602,406	23.377%	1,000,000	233,769.85	233,769.85	233,769.00	(0.85)	17.64	(13,419.96)			X
204	FY2004	9/30/2004	39,644,793	169,602,406	23.377%	39,644,793	169,602,406	23.377%	1,000,000	233,769.85	233,769.85	233,769.00	(0.85)	17.64	(13,419.96)			X
204	FY2004	12/31/2004	39,644,793	169,602,406	23.377%	39,644,793	169,602,406	23.377%	1,000,000	233,769.85	233,769.85	233,769.00	(0.85)	17.64	(13,419.96)			X
204	FY2005	6/30/2005	29,374,456	119,618,372	24.557%	29,374,456	119,618,372	24.557%	2,400,000	589,363.43	589,363.43	589,363.00	(0.43)	83,188.12	(22,357,968.39)	(59,579,927.55)		X
204	FY2005	9/30/2005	29,374,456	119,618,372	24.557%	29,374,456	119,618,372	24.557%	2,400,000	589,363.43	589,363.43	589,363.00	(0.43)	83,188.12	(22,357,968.39)	(59,579,927.55)		X
204	FY2005	12/31/2005	29,374,456	119,618,372	24.557%	29,374,456	119,618,372	24.557%	2,400,000	589,363.43	589,363.43	589,363.00	(0.43)	83,188.12	(22,357,968.39)	(59,579,927.55)		X
204	FY2006	6/30/2006	43,210,453	179,765,008	24.037%	43,210,453	179,765,008	24.037%	1,700,000	408,629.93	408,629.93	408,629.00	(0.93)	128,819.07	(9,065,127.40)	(2,714,021.10)		X

District	Fiscal Year	Date	204 FB per RH	Total Avg FB	Percent	FB per Reports	Total Avg FB per Reports	Percent based on Reports	Income	Calculated Interest Allocation	Calculated Interest Allocation per Reports	Allocation per TIO GL	Difference RH to TIO GL	Difference District FB	Difference Total Avg FB	Comments	Data Available for system report compare
204	FY2006	6/30/2006	36,197,820	146,828,292	26.015%	36,197,820	146,828,035	26.015%	1,000,000	260,152.99	260,152.99	260,153.00	0.01	(0.43)	(58,820.84)	X	
204	FY2006	6/30/2006	36,197,820	146,828,292	26.015%	36,197,820	146,828,035	26.015%	1,000,000	260,152.99	260,152.99	260,153.00	0.01	(0.43)	(58,820.84)	X	
204	FY2007	6/30/2007	43,210,453	197,206,681	21.911%	43,083,138	193,558,864	22.258%	3,600,000	788,805.08	801,302.99	788,805.00	(0.40)	[364,871.41]	[2,641,771.42]	X	
204	FY2007	6/30/2007	43,210,453	197,206,681	21.911%	43,083,138	193,558,864	22.258%	3,600,000	788,805.08	801,302.99	788,805.00	(0.40)	[364,871.41]	[2,641,771.42]	X	
204	FY2008	6/30/2008	40,046,346	184,912,943	21.657%	40,046,347	184,968,427	21.650%	1,000,000	216,568.65	216,568.65	341,568.00	124,999.35	(0.98)	[55,483.86]	X	
204	FY2008	6/30/2008	40,046,346	184,912,943	21.657%	40,046,347	184,968,427	21.650%	1,000,000	216,568.65	216,568.65	341,568.00	124,999.35	(0.98)	[55,483.86]	X	
204	FY2008	6/30/2008	44,020,982	202,691,919	21.718%	44,020,982	202,691,927	21.718%	2,877,000	624,831.82	624,831.82	624,831.00	(0.84)	(0.42)	[7,871.00]	X	
204	FY2008	6/30/2008	44,020,982	202,691,919	21.718%	44,020,982	202,691,927	21.718%	2,877,000	624,831.82	624,831.82	624,831.00	(0.84)	(0.42)	[7,871.00]	X	
204	FY2008	6/30/2008	27,275,390	138,360,794	19.713%	27,275,390	138,362,390	19.713%	1,240,000	197,130.00	197,130.00	197,130.00	724.91	-	[1,595.60]	X	
204	FY2009	6/30/2009	42,768,413	199,101,607	21.481%	42,768,413	199,475,079	21.440%	1,800,000	386,657.55	386,657.55	633,364.00	246,711.45	0.29	[373,471.90]	X	
204	FY2009	6/30/2009	42,768,413	199,101,607	21.481%	42,768,413	199,475,079	21.440%	1,800,000	386,657.55	386,657.55	633,364.00	246,711.45	0.29	[373,471.90]	X	
204	FY2009	6/30/2009	34,416,572	171,141,749	20.110%	34,416,573	171,218,888	20.101%	750,000	150,824.85	150,756.90	150,846.00	21.15	(0.70)	[77,139.22]	X	
204	FY2010	6/30/2010	50,973,820	255,890,334	19.920%	50,973,820	255,890,330	19.920%	1,750,000	348,602.92	348,602.92	348,602.00	(0.92)	(0.15)	[196.18]	X	
204	FY2010	6/30/2010	50,973,820	255,890,334	19.920%	50,973,820	255,890,330	19.920%	1,750,000	348,602.92	348,602.92	348,602.00	(0.92)	(0.15)	[196.18]	X	
204	FY2011	6/30/2011	48,216,829	252,109,900	19.125%	48,216,829	252,129,906	19.124%	4,000,000	765,012.86	764,952.16	563,012.00	[200,000.86]	(0.24)	[20,006.16]	X	
204	FY2011	6/30/2011	48,216,829	252,109,900	19.125%	48,216,829	252,129,906	19.124%	4,000,000	765,012.86	764,952.16	563,012.00	[200,000.86]	(0.24)	[20,006.16]	X	
204	FY2011	6/30/2011	24,795,502	160,926,622	15.408%	24,795,502	160,926,627	15.408%	500,000	77,039.78	77,039.78	77,040.00	0.22	(0.46)	[5.18]	X	
204	FY2012	6/30/2012	48,277,595	240,031,526	20.113%	48,277,596	241,103,133	20.024%	1,750,000	351,977.89	350,413.50	336,977.00	[15,000.39]	(0.66)	[1,071,606.82]	X	
204	FY2012	6/30/2012	48,277,595	240,031,526	20.113%	48,277,596	241,103,133	20.024%	1,750,000	351,977.89	350,413.50	336,977.00	[15,000.39]	(0.66)	[1,071,606.82]	X	
204	FY2012	6/30/2012	36,050,979	196,957,796	18.304%	36,050,979	197,720,433	18.233%	750,000	137,275.33	136,749.82	137,279.00	(0.33)	(0.21)	[762,637.48]	X	
204	FY2012	6/30/2012	36,050,979	196,957,796	18.304%	36,050,979	197,720,433	18.233%	750,000	137,275.33	136,749.82	137,279.00	(0.33)	(0.21)	[762,637.48]	X	
97,070.12																	

Lyons Township Trustees of Schools
Interest Allocation
Compare System Reports to GL and RH calculations

10/25/2016 10:53

District	Fiscal Year	Date	204 FB per RH	Total Avg FB	Percent	FB per Reports	Total Avg FB per Reports	Percent based on Reports	Income	Calculated Interest Allocation	Calculated Interest Reports	Allocation per TTD GL	Difference RH to TTD GL	Reports to TTD GL	Difference District FB	Difference Total Avg FB	Comments	Data Available for system report compare
204	FY2012	6/30/2012	48,277,595	240,031,526	20.113%	48,277,596	240,031,526	20.024%	1,750,000	351,977.89	350,413.50	336,977.00	(15,000.89)	(13,436.50)	(1,071,606.82)			x
204	FY2012	6/30/2012	49,171,660	240,031,526	19.180%	49,171,660	240,031,526	18.668%	1,750,000	351,977.89	350,413.50	336,977.00	(15,000.89)	(13,436.50)	(1,071,606.82)			x
204	FY2012	6/30/2012	36,050,979	196,957,796	18.304%	36,050,979	196,957,796	18.233%	750,000	137,279.33	136,749.82	137,279.00	(0.33)	529.18	(762,637.48)			x
204	FY2012	6/30/2012	30,436,222	166,436,000	18.283%	30,436,222	166,436,000	16.463%	750,000	137,279.33	136,749.82	137,279.00	(0.33)	529.18	(762,637.48)			x
204	FY2011	6/30/2011	48,216,829	252,099,900	19.125%	48,216,829	252,099,900	19.124%	4,000,000	765,012.86	764,952.16	765,012.00	(60.70)	(199,940.16)	(2,006,161.00)			x
204	FY2011	6/30/2011	48,216,829	252,099,900	19.125%	48,216,829	252,099,900	19.124%	4,000,000	765,012.86	764,952.16	765,012.00	(60.70)	(199,940.16)	(2,006,161.00)			x
204	FY2011	6/30/2011	24,795,502	160,926,627	15.408%	24,795,502	160,926,627	15.408%	500,000	77,039.78	77,039.78	77,040.00	0.22	0.22	(5.18)			x
204	FY2011	6/30/2011	24,795,502	160,926,627	15.408%	24,795,502	160,926,627	15.408%	500,000	77,039.78	77,039.78	77,040.00	0.22	0.22	(5.18)			x
204	FY2010	6/30/2010	50,973,820	255,890,334	19.920%	50,973,820	255,890,334	19.920%	1,750,000	348,602.97	348,602.97	348,602.00	(0.97)	(196.18)	(196.18)			x
204	FY2010	6/30/2010	50,973,820	255,890,334	19.920%	50,973,820	255,890,334	19.920%	1,750,000	348,602.97	348,602.97	348,602.00	(0.97)	(196.18)	(196.18)			x
204	FY2010	6/30/2010	28,887,593	144,000,754	20.033%	28,887,593	144,000,754	20.047%	750,000	150,246.75	150,246.75	150,247.00	0.25	(108.66)	(108.66)			x
204	FY2010	6/30/2010	28,887,593	144,000,754	20.033%	28,887,593	144,000,754	20.047%	750,000	150,246.75	150,246.75	150,247.00	0.25	(108.66)	(108.66)			x
204	FY2009	6/30/2009	42,768,413	199,101,607	21.481%	42,768,413	199,101,607	21.481%	1,800,000	386,652.55	385,928.62	633,364.00	246,711.45	247,435.38	(373,471.90)			x
204	FY2009	6/30/2009	42,768,413	199,101,607	21.481%	42,768,413	199,101,607	21.481%	1,800,000	386,652.55	385,928.62	633,364.00	246,711.45	247,435.38	(373,471.90)			x
204	FY2009	6/30/2009	34,416,573	171,218,888	20.110%	34,416,573	171,218,888	20.101%	750,000	150,824.85	150,756.90	150,846.00	89.10	89.10	(77,139.22)			x
204	FY2009	6/30/2009	34,416,573	171,218,888	20.110%	34,416,573	171,218,888	20.101%	750,000	150,824.85	150,756.90	150,846.00	89.10	89.10	(77,139.22)			x
204	FY2008	6/30/2008	44,020,982	202,691,927	21.718%	44,020,982	202,691,927	21.718%	2,877,000	624,831.84	624,831.84	624,831.00	(0.84)	(0.82)	(7.87)			x
204	FY2008	6/30/2008	44,020,982	202,691,927	21.718%	44,020,982	202,691,927	21.718%	2,877,000	624,831.84	624,831.84	624,831.00	(0.84)	(0.82)	(7.87)			x
204	FY2008	6/30/2008	138,360,794	138,360,794	19.713%	138,360,794	138,360,794	19.713%	1,000,000	197,132.36	197,130.09	197,855.00	722.64	724.91	(1,595.60)			x
204	FY2008	6/30/2008	138,360,794	138,360,794	19.713%	138,360,794	138,360,794	19.713%	1,000,000	197,132.36	197,130.09	197,855.00	722.64	724.91	(1,595.60)			x
204	FY2007	6/30/2007	43,210,453	197,206,681	21.911%	43,210,453	197,206,681	21.911%	3,600,000	801,302.99	801,302.99	788,805.00	(22,497.99)	(22,497.99)	(12,497.99)			x
204	FY2007	6/30/2007	43,210,453	197,206,681	21.911%	43,210,453	197,206,681	21.911%	3,600,000	801,302.99	801,302.99	788,805.00	(22,497.99)	(22,497.99)	(12,497.99)			x
204	FY2007	6/30/2007	184,968,427	184,968,427	21.657%	184,968,427	184,968,427	21.657%	1,000,000	216,568.65	216,568.65	216,568.31	0.34	0.34	(55,483.86)			x
204	FY2007	6/30/2007	184,968,427	184,968,427	21.657%	184,968,427	184,968,427	21.657%	1,000,000	216,568.65	216,568.65	216,568.31	0.34	0.34	(55,483.86)			x
204	FY2007	6/30/2007	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data			x
204	FY2007	6/30/2007	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data			x
204	FY2006	6/30/2006	39,818,907	156,817,335	25.392%	39,818,907	156,817,335	25.382%	750,000	190,439.28	190,367.88	190,440.00	0.72	72.12	(58,820.84)			x
204	FY2006	6/30/2006	39,818,907	156,817,335	25.392%	39,818,907	156,817,335	25.382%	750,000	190,439.28	190,367.88	190,440.00	0.72	72.12	(58,820.84)			x
204	FY2006	6/30/2006	129,551,760	129,551,760	28.382%	129,551,760	129,551,760	28.382%	700,000	198,674.80	198,636.55	198,675.00	0.20	2,038.45	(364,871.41)			x
204	FY2006	6/30/2006	129,551,760	129,551,760	28.382%	129,551,760	129,551,760	28.382%	700,000	198,674.80	198,636.55	198,675.00	0.20	2,038.45	(364,871.41)			x
204	FY2005	6/30/2005	29,374,456	119,618,372	24.557%	29,374,456	119,618,372	24.557%	2,400,000	589,363.43	589,363.43	774,496.55	185,133.12	83,188.12	(59,979,927.55)			x
204	FY2005	6/30/2005	29,374,456	119,618,372	24.557%	29,374,456	119,618,372	24.557%	2,400,000	589,363.43	589,363.43	774,496.55	185,133.12	83,188.12	(59,979,927.55)			x
204	FY2005	6/30/2005	38,565,241	139,691,395	27.679%	38,565,241	139,691,395	27.679%	750,000	207,592.82	194,046.74	213,805.00	6,212.18	19,758.26	(2,714,021.10)			x
204	FY2005	6/30/2005	38,565,241	139,691,395	27.679%	38,565,241	139,691,395	27.679%	750,000	207,592.82	194,046.74	213,805.00	6,212.18	19,758.26	(2,714,021.10)			x
204	FY2004	6/30/2004	55,730,719	189,913,996	29.345%	55,730,719	189,913,996	29.345%	3,000,000	880,357.22	874,286.70	880,357.00	(6,070.30)	(6,070.30)	(542,339.12)			x
204	FY2004	6/30/2004	55,730,719	189,913,996	29.345%	55,730,719	189,913,996	29.345%	3,000,000	880,357.22	874,286.70	880,357.00	(6,070.30)	(6,070.30)	(542,339.12)			x
204	FY2004	6/30/2004	169,602,406	169,602,406	23.377%	169,602,406	169,602,406	23.377%	1,000,000	233,751.36	233,751.36	233,769.00	(17.64)	17.64	(13,419.96)			x
204	FY2004	6/30/2004	169,602,406	169,602,406	23.377%	169,602,406	169,602,406	23.377%	1,000,000	233,751.36	233,751.36	233,769.00	(17.64)	17.64	(13,419.96)			x
204	FY2003	6/30/2003	36,369,528	162,899,243	22.326%	36,369,528	162,899,243	22.326%	3,750,000	837,242.10	837,328.15	837,242.00	(86.05)	(86.05)	(69,988.44)			x
204	FY2003	6/30/2003	36,369,528	162,899,243	22.326%	36,369,528	162,899,243	22.326%	3,750,000	837,242.10	837,328.15	837,242.00	(86.05)	(86.05)	(69,988.44)			x
204	FY2003	6/30/2003	30,775,601	148,921,931	20.666%	30,775,601	148,921,931	20.666%	650,000	134,326.45	134,326.45	134,327.00	0.55	0.55	(100.01)			x
204	FY2003	6/30/2003	30,775,601	148,921,931	20.666%	30,775,601	148,921,931	20.666%	650,000	134,326.45	134,326.45	134,327.00	0.55	0.55	(100.01)			x
204	FY2002	6/30/2002	40,764,068	171,514,746	23.767%	40,764,068	171,514,746	23.767%	750,000	1,509,210.36	1,445,463.17	1,509,210.00	(63,746.83)	(63,746.83)	(5,057,128.41)			x
204	FY2002	6/30/2002	40,764,068	171,514,746	23.767%	40,764,068	171,514,746	23.767%	750,000	1,509,210.36	1,445,463.17	1,509,210.00	(63,746.83)	(63,746.83)	(5,057,128.41)			x
204	FY2002	6/30/2002	31,470,817	140,153,802	22.459%	31,470,817	140,153,802	22.459%	1,250,000	216,251.29	216,251.29	216,252.00	0.71	0.71	(800,000.37)			x
204	FY2002	6/30/2002	31,470,817	140,153,802	22.459%	31,470,817	140,153,802	22.459%	1,250,000	216,251.29	216,251.29	216,252.00	0.71	0.71	(800,000.37)			x

District	Fiscal Year	Date	204 FB per RH	Total Avg FB	Percent	FB per Reports	Total Avg FB per Reports	Percent based on Reports	Income	Calculated Interest Allocation	Calculated Interest Allocation per Reports	Allocation per TTD GL	Difference RH to TTD GL	Difference TTD GL	Difference District FB	Difference Total Avg FB	Comments	Data Available for system report compare
204	FY2000	6/30/2000	26,559,702	165,359,702	15.76%	26,559,702	165,359,702	15.76%	3,800,000	889,419.78	889,419.78	889,420.00	0.22	(0.22)	-	1,499,979.58		X
204	FY2001	6/30/2001	37,501,662	160,223,912	23.406%	37,501,662	160,223,912	23.406%	3,800,000	889,419.66	889,419.66	889,420.00	0.34	(0.34)	-	(21.08)		X
204	FY2002	6/30/2002	33,607,400	150,007,600	22.610%	33,607,400	150,007,600	22.610%	2,000,000	425,200.50	425,200.50	425,200.00	(0.50)	(0.50)	0.01	2,005,420.05		X
204	FY2003	6/30/2003	33,674,900	155,031,030	21.721%	33,674,900	155,031,030	21.721%	1,500,000	325,820.90	325,820.90	325,821.00	0.10	0.10	-	(27.55)		X
204	FY2004	6/30/2004	39,255,271	169,505,904	23.159%	39,255,271	169,505,904	23.159%	3,000,000	694,759.35	694,759.35	694,759.00	0.35	(0.35)	-	0.04		X
204	FY2005	6/30/2005	33,434,128	147,749,785	22.629%	33,434,128	147,749,785	22.629%	1,500,000	339,433.26	339,433.26	339,433.00	(0.26)	(0.26)	0.01	0.02		X
204	FY1999	6/30/1999	36,945,517	156,916,691	23.545%	36,945,517	156,916,691	23.545%	1,000,000	225,400.00	225,400.00	225,400.00	(0.00)	(0.00)	1,254,702.82	(499.97)		X
204	FY1998	6/30/1998	33,565,522	140,041,980	23.968%	33,565,522	140,041,980	23.968%	1,250,000	299,602.32	299,602.32	299,602.00	(0.32)	(0.32)	(0.02)	(65,611.98)		X
204	FY1997	6/30/1997	38,626,585	154,228,080	25.045%	38,626,585	154,228,080	25.045%	1,000,000	1,001,804.15	1,001,804.15	1,003,907.00	2,102.85	2,102.85	1,404,454.85	(361,638.83)		X
204	FY1996	6/30/1996	28,440,940	135,711,903	20.957%	28,440,940	135,711,903	20.957%	1,350,000	785,881.87	785,881.87	785,881.00	(0.87)	(0.87)	1,226,206.36	(1,720,272.85)		X
204	FY1995	6/30/1995	29,576,100	113,049,704	26.162%	29,576,100	113,049,704	26.162%	1,650,000	431,673.53	431,673.53	431,677.00	3.47	3.47	837,751.06	313,056.41		X
204	FY1994	6/30/1994	29,922,778	85,642,629	34.939%	29,922,778	85,642,629	34.939%	800,000	245,604.97	245,604.97	245,680.00	75.03	72.83	0.01	849.84		X
204	FY1993	6/30/1993	29,267,366	84,106,199	34.798%	29,267,366	84,106,199	34.798%	625,000	217,488.17	217,488.17	217,358.00	(130.17)	(130.17)	#VALUE!	#VALUE!		X
204	FY1992	6/30/1992	27,200,000	78,400,000	31.750%	27,200,000	78,400,000	31.750%	625,000	217,488.17	217,488.17	217,358.00	(130.17)	(130.17)	#VALUE!	#VALUE!		X
													1,478,062.51					
													1,859,895.05					

Lyons Township Trustees of Schools
 Interest Allocation
 Compare System Reports to GL and RH calculations

10/25/2016 10:54

District	Fiscal Year	Date	204 FB per RH	Total Avg FB	Percent	Income	Calculated Interest Allocation	Allocation per TTD GL	Difference	Comments	If Then <	If Then >
204	FY2012	6/30/2012	48,277,595	240,031,526	20.113%	1,750,000	351,977.89	356,977.00	(15,000.89)		1	FALSE
204	FY2012	7/31/2012	49,179,650	249,842,734	19.692%	1,750,000	372,552.09	377,552.00	(5,000.00)		1	FALSE
204	FY2012	1/31/2012	36,050,979	196,957,796	18.304%	750,000	137,279.33	137,279.00	(0.33)		FALSE	FALSE
204	FY2012	4/30/2012	30,955,222	165,440,003	18.436%	750,000	123,644.68	123,644.00	(0.68)		FALSE	FALSE
204	FY2011	6/30/2011	48,216,829	252,109,900	19.125%	4,000,000	765,012.86	565,012.00	(200,000.86)		1	FALSE
204	FY2011	7/31/2011	49,179,650	261,957,816	18.414%	4,000,000	846,912.70	646,912.00	(200,000.70)		1	FALSE
204	FY2011	1/31/2011	24,795,502	160,926,622	15.408%	500,000	77,039.78	77,040.00	(0.22)		FALSE	FALSE
204	FY2011	4/30/2011	32,484,473	209,862,493	15.970%	1,500,000	84,667.52	84,668.00	(0.48)		FALSE	FALSE
204	FY2010	6/30/2010	50,973,920	255,890,334	19.920%	1,750,000	348,603.18	348,602.00	(1.18)		FALSE	FALSE
204	FY2010	7/31/2010	49,496,748	222,729,440	22.349%	1,500,000	316,067.75	316,068.00	(0.25)		FALSE	FALSE
204	FY2010	1/31/2010	28,887,593	144,200,754	20.033%	750,000	150,246.75	150,247.00	(0.25)		FALSE	FALSE
204	FY2010	4/30/2010	25,816,413	145,416,435	20.012%	750,000	150,494.55	150,495.00	(0.45)		FALSE	FALSE
204	FY2009	6/30/2009	42,768,413	199,101,607	21.481%	1,800,000	386,652.55	633,364.00	246,711.45		FALSE	1
204	FY2009	7/31/2009	36,438,797	178,709,100	20.384%	1,500,000	297,402.57	297,403.00	(0.43)		FALSE	FALSE
204	FY2009	1/31/2009	34,416,572	171,141,749	20.110%	750,000	150,824.85	150,846.00	(21.15)		FALSE	FALSE
204	FY2009	4/30/2009	27,814,683	154,432,478	18.064%	1,500,000	150,831.84	150,831.00	(0.84)		FALSE	FALSE
204	FY2008	6/30/2008	40,020,982	202,691,919	21.718%	2,877,000	624,831.84	624,831.00	(0.84)		FALSE	1
204	FY2008	7/31/2008	35,562,277	181,052,083	20.197%	1,500,000	344,136.72	295,000.00	(49,136.72)		FALSE	FALSE
204	FY2008	1/31/2008	27,275,390	138,360,794	19.715%	1,000,000	197,132.36	197,855.00	722.64		FALSE	1
204	FY2008	4/30/2008	31,432,322	149,710,108	20.982%	1,000,000	205,567.56	305,567.52	(100,000.00)		FALSE	1
204	FY2007	6/30/2007	43,210,453	197,206,681	21.911%	3,600,000	788,805.08	788,805.00	(0.08)		FALSE	1
204	FY2007	7/31/2007	35,417,252	165,402,507	20.319%	1,500,000	324,000.22	444,000.12	(120,000.00)		FALSE	1
204	FY2007	1/31/2007	40,046,346	184,912,943	21.657%	1,000,000	216,568.65	341,568.00	(124,999.35)		FALSE	1
204	FY2007	4/30/2007	27,355,740	127,355,740	21.356%	1,000,000	216,165.15	352,424.00	(136,258.85)		FALSE	1
204	FY2007	7/31/2006	no data	no data	no data			452,165.00	452,165.00		FALSE	1
204	FY2006	6/30/2006	39,818,907	156,817,335	25.392%	1,750,000	408,639.57	537,494.00	(128,854.43)		FALSE	1
204	FY2006	7/31/2006	36,137,829	146,832,422	24.608%	1,000,000	404,152.90	404,154.00	(1.10)		FALSE	FALSE
204	FY2006	1/31/2005	36,769,528	129,551,760	28.382%	700,000	198,674.80	198,675.00	(0.20)		FALSE	FALSE
204	FY2006	4/30/2005	no data	no data	no data			210,422.00	210,422.00		FALSE	1
204	FY2005	6/30/2005	29,374,456	119,618,372	24.557%	2,400,000	589,363.43	774,496.55	(185,133.12)		FALSE	1
204	FY2005	7/31/2005	22,282,446	104,128,345	21.366%	750,000	280,572.97	250,412.00	(30,160.97)		FALSE	1
204	FY2005	1/31/2005	38,665,241	139,691,395	27.679%	750,000	207,592.82	213,805.00	(6,212.18)		FALSE	1
204	FY2005	4/30/2004	22,082,061	100,492,215	21.970%	750,000	293,402.15	227,402.00	(66,000.15)		FALSE	1
204	FY2004	6/30/2004	55,730,719	189,913,996	29.345%	3,000,000	880,357.22	880,357.00	(0.22)		FALSE	FALSE
204	FY2004	7/31/2004	44,639,460	174,182,986	25.642%	1,000,000	288,451.02	289,444.00	(992.98)		FALSE	FALSE
204	FY2004	1/31/2004	39,644,793	169,588,986	23.377%	1,000,000	233,769.85	233,769.00	(0.85)		FALSE	FALSE
204	FY2004	4/30/2003	25,097,566	137,604,467	20.455%	1,000,000	205,616.29	205,616.00	(0.29)		FALSE	FALSE
204	FY2003	6/30/2003	36,369,628	162,899,243	22.326%	no data	no data	837,242.10	(0.10)		FALSE	FALSE
204	FY2003	7/31/2003	30,775,601	148,921,931	20.666%	650,000	134,326.36	134,327.00	(0.64)		FALSE	FALSE
204	FY2003	1/31/2003	26,899,703	140,160,850	19.183%	750,000	143,908.03	143,908.00	(0.03)		FALSE	FALSE

District 204
Interest Allocation Analysis
Summary of Differences by Fiscal Year

Fiscal Year	RH Calculation vs General Ledger +/- \$1,000 per Quarter
FY1995	5,000.34
FY1996	
FY1997	44,903.13
FY1998	(95,052.36)
FY1999	
FY2000	2,499.65
FY2001	
FY2002	
FY2003	
FY2004	
FY2005	127,611.74
FY2006	420,744.00
FY2007	827,163.47
FY2008	127,863.26
FY2009	246,711.45
FY2010	
FY2011	(240,001.56)
FY2012	(40,001.08)
	<u>\$ 1,427,442.04</u>

Martin :

" Interest Allocation 2 "



MARTIN

7

Lyons Township Trustees of Schools
Interest Allocation
Compares System Reports to GI and RH calculations
Selected quarters with no missing data

Summary fund balance report

District	Fiscal Year	Date	204 FB per RH	Total Avg FB	Percent	FB per Reports	Total Avg FB per Reports	Percent based on Reports	Income	Calculated Interest Allocation	Calculated Interest Allocation per Reports	Allocation per TTD GL	Difference RH to TTD GL	Difference Reports to TTD GL	Difference District FB	Difference Total Avg FB
204	FY1995	4/30/1995	26,156,713	97,267,632		26,156,713	97,267,632		950,000			250,567.00	5,000.39	4,111.51	837,751.06	513,856.41
204	FY1996	4/30/1996	25,309,400	101,912,772		25,309,400	101,912,772		1,200,000	259,829.58	259,777.41	299,829.00	(0.56)	51.39		(230,229.46)
204	FY1996	10/31/1996	22,187,062	85,474,354		22,187,062	85,474,354		1,100,000	285,565.99	285,512.62	285,565.00	(0.99)	32.38		(1,131.37)
204	FY1997	4/30/1997	23,170,014	123,518,599		23,170,014	123,518,599		1,100,000	228,216.76	228,179.34	228,217.00	0.24	3,397.66		(1,720,272.85)
204	FY1997	10/31/1997	25,669,289	113,903,587		25,669,289	113,903,587		900,000	202,998.31	202,998.81	202,998.00	(0.31)	(0.91)		(600,085.63)
204	FY1998	4/30/1998	34,949,493	136,222,968		34,949,493	136,222,968		1,500,000	379,252.32	379,267.59	383,927.00	4,674.68	4,659.41		(361,638.43)
204	FY1998	10/31/1998	32,132,226	126,297,427		32,132,226	126,297,427		1,000,000	254,417.11	255,894.84	254,417.00	(0.11)	(1,477.84)		1,808,962.36
204	FY1999	4/30/1999	36,943,517	156,916,891		36,943,517	156,916,891		2,675,000	676,909.27	653,918.74	676,909.00	(0.27)	22,990.26		(489.57)
204	FY1999	10/31/1999	27,865,770	119,901,624		27,865,770	119,901,624		1,500,000	348,807.92	348,608.02	348,608.00	0.08	(0.02)		(65,611.88)
204	FY2000	1/31/2000	33,434,128	147,749,785		33,434,128	147,749,785		1,500,000	339,433.26	339,433.26	339,433.00	(0.26)	(0.26)		0.04
204	FY2001	4/30/2001	33,817,420	150,007,615		33,817,420	150,007,615		2,000,000	452,209.11	453,339.68	452,209.00	(0.31)	(6,130.68)		0.02
204	FY2001	10/31/2001	28,280,408	131,981,575		28,280,408	131,981,575		1,000,000	215,253.99	215,253.99	215,254.00	0.01	0.01		(21.08)
204	FY2002	4/30/2002	34,371,664	150,845,750		34,371,664	150,845,750		1,250,000	286,481.92	286,291.29	286,292.00	(189.82)	0.71		(72.35)
204	FY2002	10/31/2002	26,156,703	135,372,728		26,156,703	135,372,728		600,000	115,957.95	117,679.40	115,957.00	(0.95)	(1,722.40)		133,708.09
204	FY2003	4/30/2003	36,569,628	162,899,243		36,569,628	162,899,243		3,750,000	837,242.10	837,528.15	837,242.00	(0.10)	(86.15)		14,502.30
204	FY2003	10/31/2003	33,817,420	150,007,615		33,817,420	150,007,615		1,000,000	215,253.99	215,253.99	215,254.00	0.01	0.01		100.01
204	FY2004	4/30/2004	35,730,719	189,913,996		35,730,719	189,913,996		750,000	143,908.09	142,489.25	143,908.00	(0.09)	1,418.75		542,339.12
204	FY2004	10/31/2004	39,644,793	189,913,996		39,644,793	189,913,996		3,000,000	880,857.22	874,286.70	880,357.00	(0.27)	6,070.50		542,345.31
204	FY2005	4/30/2005	38,565,241	139,691,395		38,565,241	139,691,395		1,000,000	283,769.35	283,731.36	283,769.00	(0.85)	17.64		(13,419.96)
204	FY2005	10/31/2005	35,440,017	136,977,374		35,440,017	136,977,374		2,400,000	589,368.43	593,308.43	589,368.00	(0.95)	3,940.00		(99,979,927.35)
204	FY2006	4/30/2006	43,210,453	179,766,003		43,210,453	179,766,003		1,700,000	408,829.57	408,829.57	408,829.00				(59,820.84)
204	FY2006	10/31/2006	38,197,820	146,828,035		38,197,820	146,828,035		1,000,000	260,152.99	260,153.45	260,153.00	0.01	(0.45)		(55,483.86)
204	FY2007	4/30/2007	43,210,453	197,206,681		43,210,453	197,206,681		9,600,000	789,805.08	801,302.99	788,805.00	(0.09)	(12,497.99)		(2,641,711.42)
204	FY2007	10/31/2007	40,046,346	184,912,948		40,046,346	184,912,948		1,000,000	216,568.65	215,503.69	216,568.00	0.01	1,064.31		3,647,816.70
204	FY2008	4/30/2008	44,020,982	202,691,919		44,020,982	202,691,919		2,877,000	624,831.84	624,831.82	624,831.00	(0.84)	(0.82)		(55,483.86)
204	FY2008	10/31/2008	31,130,466	131,630,466		31,130,466	131,630,466		1,500,000	348,807.92	348,608.02	348,608.00	0.08	(0.02)		(7.87)

Selected quarters with no missing data

\$ 206,468,890.98
\$ 94,038,428.16

\$ 206,468,890.98
\$ 94,038,428.16

Selected quarters with +/- \$1,000 difference1,477,566.65

District	Fiscal Year	Date	204 FR per RH	Total Avg FR	Percent	FR per Reports	Total Avg FR per Reports	Percent based on Reports	Income	Calculated Interest Allocation	Calculated Interest Reports	Allocation per TTD GL	Difference RH to TTD GL	Difference Reports to TTD GL	Change to TTD GL	Difference District FR	Difference Total Avg FR	Comments	Data Available for system report compare
204 FY2012	6/30/2012	48,277.596	240,031,526	20.113%	48,277.596	241,105,133	20.024%	1,750,000	351,977.89	350,413.50	356,977.00	(15,000.89)	(13,486.50)	(1,071,606.82)					
204 FY2012	1/31/2012	36,050.979	196,957,795	18.044%	36,050.979	197,720,433	18.293%	750,000	137,273.33	136,749.82	137,278.00	(0.38)	529.18	(762,637.48)					
204 FY2011	6/30/2011	48,216.829	252,109,900	19.125%	48,216.829	253,129,906	19.324%	4,000,000	785,012.66	784,952.16	585,012.00	(200,000.66)	(199,940.16)	(20,006.16)					
204 FY2011	1/31/2011	34,795.502	160,926,822	16.408%	34,795.502	160,926,677	16.406%	500,000	77,039.78	77,039.78	77,040.00	0.22	0.22	(5.18)					
204 FY2010	6/30/2010	50,973.820	255,890,334	19.920%	50,973.820	255,890,530	19.920%	1,750,000	348,603.18	348,602.92	948,602.00	(1.18)	(0.32)	(196.18)					
204 FY2010	1/31/2010	28,887.593	144,200,754	20.033%	28,887.593	144,086,289	20.047%	750,000	150,246.75	150,355.68	150,247.00	0.25	(108.68)	104,470.94					
204 FY2009	6/30/2009	42,768.413	189,101,007	21.481%	42,768.413	189,475,079	21.404%	1,800,000	386,652.35	385,928.62	639,584.00	248,711.45	247,483.38	(378,471.90)					
204 FY2009	1/31/2009	34,416.972	171,141,749	20.110%	34,416.973	171,218,888	20.107%	750,000	150,824.85	150,756.00	150,846.00	21.15	89.10	(77,139.22)					
204 FY2008	6/30/2008	44,020.982	202,691,919	21.718%	44,020.982	202,691,927	21.718%	2,877,000	624,831.44	624,831.42	624,831.00	(0.42)	(0.42)	(7.47)					
204 FY2008	1/31/2008	27,275.390	138,560,794	19.715%	27,275.390	138,562,390	19.715%	1,000,000	197,132.16	197,130.09	197,853.00	722.64	724.91	(1,595.60)					
204 FY2007	6/30/2007	49,210.459	197,206,681	21.911%	49,089,138	189,556,864	22.255%	3,600,000	788,805.08	801,302.99	788,805.00	(0.08)	(12,497.99)	9,647,816.70					
204 FY2007	1/31/2007	40,046.946	184,912,943	21.657%	40,046.947	184,958,427	21.650%	1,000,000	216,568.65	216,569.69	841,568.00	124,999.35	125,064.31	(55,483.65)					
204 FY2007	7/31/2006	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data	no data					
204 FY2006	4/30/2006	39,818,907	156,817,735	25.397%	39,818,907	156,876,156	25.387%	750,000	190,439.28	190,367.88	190,440.00	0.72	72.12	(56,820.84)					
204 FY2006	10/31/2005	36,769,528	129,554,760	28.382%	37,134,400	132,193,531	28.031%	700,000	139,674.80	139,636.55	198,675.00	0.20	2,038.45	(2,641,771.42)					
204 FY2005	6/30/2005	29,374,456	119,618,972	24.577%	31,792,424	178,598,300	28.005%	2,400,000	589,365.43	691,308.43	774,496.53	185,133.13	83,188.12	(59,379,927.55)					
204 FY2005	1/31/2005	38,665,241	139,691,345	27.675%	35,440,017	136,977,374	25.178%	750,000	207,592.82	194,046.74	no data	8.18	19,554.26	2,714,021.10					
204 FY2004	6/30/2004	55,750,719	189,913,986	29.345%	55,188,374	188,371,657	29.145%	9,000,000	880,357.22	874,286.70	880,357.00	(0.22)	6,070.30	541,339.13					
204 FY2004	1/31/2004	39,644,738	169,584,986	23.377%	39,644,738	169,602,406	23.375%	1,000,000	238,789.85	238,751.56	238,789.00	(0.85)	17.64	(13,413.96)					
204 FY2003	6/30/2003	36,365,823	162,059,249	22.325%	36,370,128	162,804,741	22.329%	3,750,000	837,242.10	837,326.15	837,242.00	(0.10)	(6.15)	100.01					
204 FY2003	1/31/2003	30,775,601	144,921,931	20.666%	30,775,601	144,921,931	20.666%	650,000	134,326.36	134,326.45	134,327.00	0.64	0.55	100.01					
204 FY2002	6/30/2002	40,764,068	171,514,746	23.767%	37,891,080	166,457,618	22.763%	6,350,000	1,509,210.38	1,445,469.17	1,509,210.00	(0.36)	63,746.83	2,777,908.47					
204 FY2002	1/31/2002	31,682,812	149,158,893	21.243%	31,682,812	149,025,185	21.260%	500,000	105,204.24	106,239.52	106,204.00	(0.24)	(99.52)	139,708.03					
204 FY2001	6/30/2001	37,501,862	160,223,912	28.406%	37,503,662	160,223,993	28.406%	3,400,000	889,419.78	889,419.66	889,420.00	0.22	0.34	(21.08)					
204 FY2001	1/31/2001	33,674,500	155,031,030	21.721%	33,674,500	155,031,059	21.721%	1,500,000	325,820.90	325,820.86	325,821.00	0.10	0.15	(27.45)					
204 FY2000	6/30/2000	39,255,271	169,605,904	23.159%	39,255,271	169,505,904	23.159%	3,000,000	694,759.35	694,759.35	697,259.00	2,499.65	2,499.65	0.04					
204 FY2000	1/31/2000	33,434,128	147,749,785	22.629%	33,434,128	147,749,785	22.629%	1,500,000	339,431.26	339,431.26	339,433.00	(0.26)	(0.26)	0.02					
204 FY1999	6/30/1999	36,946,517	156,816,631	23.543%	35,690,814	156,917,191	22.745%	2,875,000	676,909.27	693,914.74	676,909.00	(0.27)	22,990.26	(495.97)					

204	FY1999	2/28/1999	33,565,322	140,041,980	23.968%	33,565,322	140,107,452	23.977%	1,250,000	299,602.32	299,452.02	299,602.00	0.32	139.98	1,404,454.85	(0.02)	(65,611.98)	X
204	FY1998	6/30/1998	38,626,585	154,228,090	25.045%	37,222,130	154,599,728	24.076%	4,000,000	1,001,804.13	963,120.39	1,003,907.00	2,102.85	40,786.61	1,404,454.85		(65,611.98)	X
204	FY1998	7/31/1998	40,930,769	148,975,942	27.473%	40,930,769	147,668,979	27.719%	2,250,000	618,181.90	623,653.19	515,352.00	(101,129.90)	(107,901.19)	1,404,454.85		(65,611.98)	X
204	FY1997	6/30/1997	28,440,940	135,711,903	20.957%	27,214,732	137,432,175	19.802%	3,750,000	785,881.87	742,585.29	850,785.00	44,903.13	88,198.71	1,404,454.85		(65,611.98)	X
204	FY1997	7/31/1997	27,678,819	125,904,946	21.984%	27,678,819	126,505,031	21.880%	3,350,000	296,782.67	295,374.86	296,783.00	0.33	1,408.14	1,404,454.85		(65,611.98)	X
204	FY1996	6/30/1996	28,484,390	118,940,261	23.952%	27,874,872	118,940,262	23.436%	2,100,000	502,968.80	497,156.57	502,989.00	0.20	10,832.43	1,404,454.85		(65,611.98)	X
204	FY1996	7/31/1996	24,912,378	96,625,890	25.782%	24,912,378	96,655,920	25.721%	800,000	206,258.84	205,768.55	206,259.00	0.16	480.45	1,404,454.85		(65,611.98)	X
204	FY1995	6/30/1995	29,576,100	113,049,704	26.162%	28,739,349	112,785,848	25.492%	1,650,000	431,673.53	420,614.00	431,677.00	3.47	11,063.00	1,404,454.85		(65,611.98)	X
204	FY1995	7/31/1995	29,145,605	94,994,904	30.701%	29,145,605	94,994,054	30.701%	800,000	245,604.97	245,607.17	245,680.00	75.03	72.93	1,404,454.85		(65,611.98)	X
204	FY1994	6/30/1994	29,972,778	85,642,329	34.939%	missing data	missing data	missing data	700,000	244,573.82	missing data	244,574.00	0.18	missing data	1,404,454.85		(65,611.98)	X
204	FY1994	7/31/1994	29,267,565	84,106,199	34.798%	missing data	missing data	missing data	625,000	217,488.17	missing data	217,358.00	(130.17)	missing data	1,404,454.85		(65,611.98)	X
												1,427,938.51						
												381,832.54						
												3,809,771.05						

3/30/2017 11:32

if Then < if then >

if Then < if then >

if Then < if then >

District	Fiscal Year	Date	204 FB per RH	Total Avg FB	Percent	Income	Calculated Interest Allocation	Allocation per TIO GL	Difference	Comments
204	FY1994	1/31/1994	29,267,366	84,106,199	34.798%	625,000	217,488.17	217,358.00	(130.17)	
									1,478,062.51	NET
									381,832.54	SUM OF REDUCTIONS IN INTEREST
									1,859,895.05	POTENTIAL OVERAGE

If Then <

FALSE

If then >

FALSE

FALSE

FALSE

FALSE

1

1

FALSE

EXHIBIT 17

1
2 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
3 COUNTY DEPARTMENT - CHANCERY DIVISION
4 TOWNSHIP TRUSTEES OF)
5 SCHOOLS TOWNSHIP 38 NORTH)
6 RANGE 12 EAST,)
7 Plaintiff,)
8 -vs-) Case No. 13 CH
9 LYONS TOWNSHIP HIGH SCHOOL) 23386
10 DISTRICT 204,)
11 Defendant.)
12
13 The deposition of KELLY A. BRADSHAW,
14 called by the Defendant for examination, taken
15 pursuant to the provisions of the Code of Civil
16 Procedure and the Rules of the Supreme Court of the
17 State of Illinois pertaining to the taking of
18 depositions for the purpose of discovery, taken
19 before SHARON A. STUCKLY, a Notary Public within and
20 for the County of Cook, State of Illinois and a
21 Certified Shorthand Reporter of said state at 20
22 North Clark Street, Suite 2500, Chicago, Illinois,
23 on the 25th day of October A.D. 2016 at 1:05 p.m.
24

1 PRESENT:
2
3 MILLER, CANFIELD, PADDOCK and STONE, PLC,
4 by
5 MR. BARRY P. KALTENBACH
6 225 West Washington Street, Suite 2600
7 Chicago, Illinois 60606
8 (312) 460-4251
9 kaltenbach@millercanfield.com
10 Appeared on behalf of the Plaintiff;
11
12 HOFFMAN LEGAL, by
13 MR. JAY R. HOFFMAN
14 20 North Clark Street, Suite 2500
15 Chicago, Illinois 60602
16 (312) 899-0899
17 jay@hoffmanlegal.com
18 Appeared on behalf of the Defendant.
19
20 ALSO PRESENT:
21
22 MR. RANDALL D. WILSON.
23
24

I N D E X

1	WITNESS	EXAMINATION
2	KELLY A. BRADSHAW	
3	By Mr. Hoffman	4
4		
5	E X H I B I T S	
6	NUMBER	MARKED OR FIRST REFERRED TO
7	Bradshaw Deposition Exhibit	
8	No. 1	55
9	No. 2	56
10	No. 3	62
11	No. 4	105
12	No. 5	116
13	No. 6	116
14	No. 7	126
15	No. 8	126
16	No. 9	138
17		
18		
19		
20		
21		
22		
23		
24		

1 (WHEREUPON, the witness was duly sworn.)
2 KELLY A. BRADSHAW,
3 called as a witness herein, having been first duly
4 sworn on oath, was examined and testified as follows:
5 EXAMINATION
6 BY MR. HOFFMAN:
7 Q All right. Would you be so kind as to
8 state your full name?
9 A Kelly Ann Bradshaw.
10 Q All right. And at what address can we
11 reach you?
12 A 1115 Daisy Lane in Naperville, Illinois.
13 Q Is that your home residence?
14 A Yes.
15 Q What's your zip code?
16 A 60564.
17 Q All right. Terrific. Have you ever
18 given a deposition before?
19 A No.
20 Q All right. And Barry Kaltenbach is the
21 gentleman seated to next to you. And is it fair to
22 say that he is representing you as your attorney at
23 this deposition?
24 A Yes.

Page 61

Page 63

1 had indicated that it was okay and she proceeded
2 with the payments.
3 Q Did she ever alert anybody at the TTO
4 that Healy was getting more in income than he was
5 supposed to get under his contract with the TTO?
6 A Not to my knowledge.
7 Q Okay. And despite her knowledge of this
8 fraud by Mr. Healy and her failure to alert anybody
9 to it, why did you think it was appropriate to
10 have Miss Carnival work on your analyses in this
11 case?
12 A She was part of a team that compared a
13 specific report to a column in here that I had
14 reviewed. And so I was just having a second set of
15 eyes. I felt it was appropriate given she checks
16 payroll numbers for other districts and there have
17 been no other instances of knowing. It wasn't the
18 same situation.
19 Q Okay. And let's mark this as document
20 called interest allocation 2 dot XLS produced 2
21 slash 19 slash 2016 as Bradshaw Exhibit 3, please.
22 MR. KALTENBACH: Which one -- I'm sorry.
23 Which one was 2?
24 MR. HOFFMAN: Interest allocation 1 is

Page 62

1 Bradshaw 2. Interest allocation 2 is Bradshaw 3.
2 (WHEREUPON, the document was
3 marked for identification as
4 Bradshaw Deposition Exhibit No. 3.)
5 BY MR. HOFFMAN:
6 Q And what is the difference between
7 interest allocation 1 and interest allocation 2
8 which are also marked as Bradshaw 2 and 3?
9 A When the litigation was filed a second
10 time, I was asked to go over the analysis again and
11 realized that there was a formula error in the --
12 where we were comparing the system reports to the
13 general ledger.
14 Q What was the formula error and who made
15 it?
16 A I made it.
17 Q What was it?
18 A I had -- I can't remember if it was a
19 plus or whether it was a minus. It was in relation
20 to the formula that's in purple.
21 Q The one that says compare GL dif?
22 A Yeah.
23 Q Is that short for compare general ledger
24 difference?

1 A Correct.
2 Q Compare the general ledger difference as
3 to what?
4 A So we'd have to take a step back and
5 really understand each portion of the analysis, but
6 the specific error was I had the columns subtracting
7 numbers and they should have been added together.
8 Q So you made about a \$200,000 error in
9 your initial analysis, right?
10 A I did.
11 Q And that was in excess of 10 percent of
12 the total amount that you found to be overpaid?
13 A Yes.
14 Q And so instead of \$1.38 million
15 approximately being overpaid to District 204, you
16 went back and decided it was really about
17 \$1.57 million overpaid to District 204?
18 A Yes.
19 Q Okay. And given that you made an error
20 of this magnitude in your initial analysis, why do
21 you feel that it's fair for us to rely upon your
22 analysis that you presented here in interest
23 allocation 2?
24 A I have -- the initial analysis was

Page 64

1 prepared very quickly. The second time I had more
2 time to go through and make sure that everything was
3 accurate.
4 Q And so is it fair to say that you're
5 certain sitting here today that the numbers and
6 figures used in interest allocation 2 are correct
7 and there aren't any other errors?
8 A To the best of my knowledge, yes.
9 Q Why don't -- let's use interest
10 allocation 2 which is Bradshaw No. 3 and running
11 through -- and having you explain to me the analysis
12 that you did on interest allocation.
13 So before we get to the specific columns
14 and rows of this document, why don't you tell me who
15 asked you to do what in connection with interest
16 paid to District 204 by the TTO for a period of
17 years?
18 A Mr. Theissen asked me to compare the
19 interest earnings that were received by District 204
20 in comparison to Mr. Healy's calculations and what
21 was actually recorded in the general ledger.
22 Q Did he explain why he wanted you to
23 perform this analysis?
24 A No.

Page 85

Page 87

1 analysis, did you form any conclusions as to why
2 there was such a big discrepancy between the records
3 that Bob Healy kept of interest payments and
4 whatever it said in the general ledger?

5 A I couldn't speak to why it occurred. He
6 was not available for any sort of questioning. All
7 we could do was identify what those differences
8 were.

9 Q And nobody at the TTO was able to lend
10 any insight of any kind into how there could be such
11 a huge discrepancy between those sets of numbers,
12 right?

13 A That's correct.

14 Q Now, let's talk about your specific
15 methodology in conducting this interest allocation
16 analysis.

17 How were you as an initial matter able
18 to determine how much income -- how much interest
19 and investment income the TTO made on the funds that
20 it held for the various districts?

21 A I did not determine that. I used the
22 number that Mr. Healy had on his documents.

23 Q What documents were those?

24 A He had a quarterly piece of paper that

1 Q Healy's interest income sheets. And in
2 some instances, were these interest income sheets
3 done for a period of time that didn't quite match up
4 to the end of the quarter that were done for other
5 months and other periods that weren't exactly
6 quarterly?

7 A No. There were interest payments that
8 were made that were not on quarterly, but there were
9 never sheets produced on the on quarters.

10 Q So in order to determine how much money
11 the -- so the money that the TTO held for District
12 204 was commingled with the money of all the other
13 districts, correct?

14 A Yes.

15 Q And the income that was earned -- the
16 investment income or interest income -- let's just
17 call it income, right?

18 A Okay.

19 Q Okay. So the income that was earned was
20 income that was earned on the whole pool of funds
21 involving District 204 and the other districts'
22 money, right?

23 A Yes.

24 Q And so you got the amount that was made

Page 86

Page 88

1 summarized income and its allocation to the
2 districts.

3 Q Did you find Healy's quarterly piece of
4 paper summarizing the income and allocation to
5 districts for every quarter in the fiscal year 1995
6 to 2012 period?

7 A No. I think there were some missing.

8 Q What was the effect of those missing
9 documents?

10 A I can't recall how he handled those.

11 Q Well, take your time and look back
12 through your analysis.

13 A I marked them as no data or NA because
14 there was no data.

15 Q Were there also instances in which
16 Robert Healy had a quarterly piece -- by the way,
17 this quarterly piece of paper, was it handwritten or
18 was it a printout of a computer record?

19 A It was mostly handwritten notes.

20 Q Handwritten notes. So this quarter --
21 and can we call that Healy's handwritten quarterly
22 income records?

23 A I think we called them Healy's interest
24 income sheets.

1 by District 204 in interest income from Healy's
2 handwritten notes called Healy's interest income
3 sheets, correct?

4 A I got the money that was distributed on
5 those handwritten sheets, yes.

6 Q Well, I don't mean -- first, in order to
7 figure out how much money should have been paid to a
8 particular district, you'd have to know how much
9 money the TTO earned in that period of time,
10 wouldn't you?

11 A I was asked to compile the numbers that
12 Healy used for interest income.

13 Q Right. But what I'm saying is you'd
14 have to know -- in order to figure out how much
15 should have been paid to district 204 in a given
16 fiscal year, you'd have to know how much money the
17 TTO made in income and then how much of that income
18 was -- belonged to on a percentage basis to District
19 204, right?

20 A I wasn't asked to look at the actual
21 interest income. I was asked to compare what
22 Mr. Healy said was income versus what was
23 distributed.

24 Q What's the difference between the actual

Page 89

Page 91

1 interest income and what Mr. Healy said was the
2 interest income? I'm not sure I understand what you
3 mean.
4 A I don't -- I don't have an actual number
5 to compare in those years. I was asked to look at
6 the interest income that he said he was distributing
7 to what was really distributed.
8 Q So you have no idea and it is not part
9 of your analysis to determine how much money the TTO
10 actually earned in interest income for each fiscal
11 year?
12 A Yeah. I don't know that.
13 Q And in order to determine that
14 information, wouldn't you -- wouldn't you have to go
15 back and look at the source documents from
16 investment brokers and advisors and banks and other
17 financial institutions to actually check and see how
18 much money the TTO earned in a given year in
19 interest?
20 A Is there a question in there? I'm
21 sorry.
22 Q Yes. There was at the end. Could you
23 read it back, please?
24 (WHEREUPON, the record was read

1 versus what was actually given to District 204.
2 Q So this number doesn't represent the
3 amount that District 204 received in interest that
4 it should not have received in interest based on the
5 actual earnings of the TTO on its money that the TTO
6 was holding for it?
7 A I can't speak to whether it was the
8 actual earnings or if there would have been any
9 differences between the numbers as to Healy
10 represented versus actual.
11 Q Okay. So how confident were you in the
12 accuracy of the figures contained in the general
13 ledger in the course of performing your analysis?
14 A I mean it's a system-generated report
15 that has been audited by the various districts'
16 auditors, so I chose to rely on the actual DCR
17 information from the general ledger.
18 Q Well, you didn't completely rely on the
19 general ledger information, did you?
20 A I don't understand the question.
21 Q Well, in looking at this summary on
22 interest allocation 2 which is also Bradshaw Exhibit
23 No. 3 which you've got in front of you, you've got a
24 column for each fiscal year on the left side and in

Page 90

Page 92

1 by the reporter as requested.)
2 BY THE WITNESS:
3 A Yes.
4 BY MR. HOFFMAN:
5 Q Okay. And you didn't perform that
6 analysis, correct?
7 A I did not.
8 Q Why not?
9 A I wasn't asked to.
10 Q Okay. But as a CPA, don't you think
11 that that would be an important part of your
12 analysis in trying to determine whether District 204
13 actually got the amount of money that it should have
14 gotten?
15 A I wasn't asked to give an opinion. I
16 was asked to compile data and compare it. That's
17 different than actually trying to have an opinion on
18 what should have been included in the analysis.
19 Q So this one -- this number that's in the
20 bottom right-hand corner of Bradshaw 3, it's
21 \$1,574,636.77, what in your estimation based on your
22 analysis does that figure represent?
23 A It represents the difference between
24 what income Mr. Healy said was to be distributed

1 the next column is RH calculation versus general
2 ledger plus or minus \$1,000 per quarter. Do you see
3 that?
4 A Yes.
5 Q Why don't you tell me what that column
6 represents.
7 A So that column is comparison of the
8 Healy interest sheets versus the GL detail for
9 interest.
10 Q And then you've got a column to the
11 right that says additional differences relating to
12 system reports versus RH figures used. What does
13 that column represent?
14 A Given we had seen differences in the
15 first comparison, we wanted to try and validate
16 whether the fund balance information that Mr. Healy
17 had on his sheets was accurate, so we pulled general
18 ledger fund balance reports.
19 Q I don't understand that. Can you
20 explain that to me a little better --
21 A Sure.
22 Q -- given that I'm not an accountant like
23 you are.
24 A So at the end of each month, the system

Page 93

Page 95

1 will generate what's called a fund balance report.
2 For school districts, they are required to have
3 certain individual funds like operations, education
4 funds, various other funds, and all of their
5 accounting is supposed to be allocated between those
6 funds. And the sum of all of those funds is what
7 the interest income is supposed to be allocated
8 based on.

9 Q So were these additional system reports
10 that you used somehow in conflict with the
11 information in the general ledger such that they
12 required further correction?

13 A Well, it wasn't within the general
14 ledger. It would have been in conflict with
15 Mr. Healy's -- the information Mr. Healy had on his
16 interest income sheets.

17 Q So what information -- the first column
18 where you're comparing Healy's calculations to the
19 general ledger, what types of figures are you
20 comparing there?

21 A That would have been the calculated
22 interest allocation for 2004 on Mr. Healy's interest
23 income sheets compared to the general ledger amounts
24 for interest in that same time period.

1 the general ledger numbers are audited, you would
2 still have to believe in order to rely on those
3 numbers that the auditors did the right thing and
4 did a good job, wouldn't you?

5 A I mean there's an audit opinion out
6 there that you would be relying on. I can't speak
7 to the quality of each individual firm's audits.

8 Q Are you aware that the TTO threatened to
9 sue Baker Tilly for audits that it performed for the
10 TTO?

11 A Yes.

12 Q And are you aware of the basis upon
13 which the TTO made those threats? In other words,
14 are you aware of why the TTO believed that Baker
15 Tilly had done a deficient job in auditing the TTO?

16 A I'm not.

17 Q Are you aware of the current status of
18 that claim of the TTO against Baker Tilly?

19 A All I'm aware of is that there is a
20 tolling agreement between the treasurer's office and
21 Baker Tilly. I haven't seen the document nor
22 understand what it relates to.

23 Q Neither have I, interestingly enough,
24 Barry. And that was something that you had agreed

Page 94

Page 96

1 Q And why do you -- given all the problems
2 at the TTO during Healy's time as treasurer, why do
3 you think that the general ledger is accurate and
4 can be relied on as opposed to Healy's handwritten
5 materials?

6 A Well, again the general ledger detail
7 would have been audited that that journal entry
8 actually took place and was included in each
9 district's audits which would have been audited by
10 other auditing firms.

11 Q Are you confident that Baker Tilly and
12 its predecessors did an appropriate and thorough job
13 in auditing the TTO for fiscal years 1995 through
14 2012?

15 A Well, that would speak to a different
16 area, but with regard to the actual interest that
17 received, there would be Baker Tilly or other
18 auditors that are looking at whether the individual
19 districts received a journal entry for interest
20 income. And you can see the journal entry. And so
21 if that -- if those numbers are included in their
22 annual financial report, then they are audited
23 numbers.

24 Q Right. And you -- but my question is if

1 to provide to me, so I would like to see that.

2 But -- so it's your understanding that the TTO's
3 claim against Baker Tilly is subject to a tolling
4 agreement which stops the statute of limitations and
5 therefore that claim is still pending, right?

6 A Yes.

7 Q And even with that knowledge, you think
8 it's appropriate to rely upon the audited numbers
9 from the general ledger?

10 A Again you have to compare to a specific
11 source document. They -- those audits at the
12 district level are -- all we're witnessing is that
13 there's a specific journal entry that has been made,
14 so I can see the journal entry that has been made
15 and I feel comfortable relying on the general ledger.

16 Q Okay. Did you go back and check those
17 journal entries against copies of checks or bank
18 statements?

19 A There wouldn't be copies of checks or
20 bank statements in this instance. The interest
21 distribution is solely done via a journal entry.

22 Q I see. Because it's all -- because the
23 TTO is holding the money, it simply moves the money
24 from one pocket to another essentially?

Page 101

Page 103

1 from this document, can't you?
2 A Uh-huh. There really aren't any round
3 numbers in the allocations to the general ledger.
4 Q So sometimes the ---
5 A But that would be -- I mean that's what
6 was due to 204. I mean so I was responding
7 specifically to your question that the amounts given
8 to the district were flat numbers.
9 Q So I guess what I'm saying is Healy's
10 records of the amount that was due District 204, his
11 handwritten records that you're saying were largely
12 incorrect, did those show estimated amounts for some
13 quarters or were they always specific and detailed
14 numbers, dollars and cents?
15 A I didn't say that they were largely
16 incorrect. Those are your words.
17 Q Okay. They were incorrect in a majority
18 of the fiscal years according to this analysis,
19 right?
20 A I don't know what reports he used, so I
21 can't speak to if he had a piece of paper that he
22 thought was accurate in front of him. I can only
23 comment on the reports that were available to me as
24 system-generated reports.

Page 102

1 Q I see. So there was a 1.477
2 approximately million dollar difference between
3 Healy's numbers on interest payments and the numbers
4 recorded in the general ledger, correct?
5 A That one is correct, yes.
6 Q And your belief is that the general
7 ledger's information is correct and that Healy's
8 calculations are wrong, is that true or not true?
9 A I believe --
10 Q Are you making that valued judgment or
11 not or are you just saying there's a difference?
12 MR. KALTENBACH: Hold on. I'm going to
13 object to a compound question there.
14 BY MR. HOFFMAN:
15 Q Yeah. I mean I just want to make sure I
16 understand you right. So you've identified -- let
17 me ask you a better question. You've identified a
18 difference -- significant difference between Healy's
19 interest calculations and the general ledger's
20 payment records, yes?
21 A Yes.
22 Q And are you saying here today that there
23 is this difference or are you saying that Healy's
24 numbers were wrong and the numbers in the general

1 ledger were right?
2 A I'm saying that the general ledger is
3 what was received by the district.
4 Q Well, right. And are you saying that
5 the general ledger amounts -- so you're saying that
6 therefore that Healy's calculations were incorrect
7 because they didn't reflect the amount that was
8 actually paid to the district?
9 A All I can identify is that there's a
10 difference. I can't speak to which one is correct,
11 but they received more than Mr. Healy's interest
12 sheets.
13 Q Okay. And so in terms of relying on --
14 in terms of trying to determine how much should have
15 been paid to District 204, you think the best source
16 for how much District 204 was overpaid, you think
17 the best source of information is the general
18 ledger, right?
19 MR. KALTENBACH: I'll object to the form
20 of the question. You can answer.
21 BY MR. HOFFMAN:
22 Q Is that true?
23 A I'm sorry. I didn't understand the
24 question.

Page 104

1 Q In terms of your analysis claiming that
2 District 204 was overpaid interest money, interest
3 income, you think the best source of information is
4 the amount stated in the general ledger, right?
5 MR. KALTENBACH: Objection to the form.
6 You can answer.
7 BY THE WITNESS:
8 A The general ledger says what they were
9 actually paid. And I've identified differences
10 between Mr. Healy's spreadsheets and what they were
11 actually paid.
12 BY MR. HOFFMAN:
13 Q Okay. And again you don't have any
14 understanding as to why there is this difference?
15 A I do not.
16 Q Okay. Yet at the same time you're
17 relying on Healy's figures in his handwritten
18 reports as to how much income was earned, aren't
19 you?
20 A That was just what was -- he was
21 intending to distribute. I wasn't asked to compare
22 that to any real or unreal interest income.
23 Q But in this analysis, aren't you
24 assuming that Healy's figures in his handwritten

Page 109

Page 111

1 MR. KALTENBACH: Objection as to form.
2 BY THE WITNESS:
3 A I mean given the general ledger is
4 different than what he asserted was to be
5 distributed, that is an error.
6 BY MR. HOFFMAN:
7 Q That is not my question.
8 Read my question back, please.
9 (WHEREUPON, the record was read
10 by the reporter as requested.)
11 BY THE WITNESS:
12 A I mean there's an error in that there
13 are differences.
14 BY MR. HOFFMAN:
15 Q That's not my question.
16 A I don't understand --
17 MR. KALTENBACH: He didn't ask you a
18 question. He just made a statement.
19 BY MR. HOFFMAN:
20 Q You've identified differences between
21 two sets of numbers, correct?
22 A Yes.
23 Q Okay. But what I'm asking you is
24 something different which is do you have an opinion

Page 110

1 as to whether the treasurer actually overpaid
2 District 204 over \$1.5 million in interest during
3 the time periods that we're talking about which is
4 the allegation that's made in paragraph 44?
5 MR. KALTENBACH: Objection.
6 BY MR. HOFFMAN:
7 Q You can say I believe that's correct
8 based on the analysis that I did. You can say that
9 I can't verified this because my analysis was more
10 limited. Or you can say anything you want. But I
11 want to know whether or not your analysis -- how
12 your analysis relates to the statement of fact in
13 paragraph 44 of the amended complaint.
14 MR. KALTENBACH: Objection. Form. And
15 significantly compound which is part of form. And
16 foundation.
17 BY MR. HOFFMAN:
18 Q Do you understand the question?
19 A This last one, no. You compiled many
20 things into there.
21 Q Okay. Let me ask you a better question.
22 Paragraph 44 of the amended complaint states, "In
23 fiscal years 1995 through 2012, the treasurer
24 erroneously allocated \$1,574,636.77 in interest on

1 investments to District 204," quote. Based on the
2 analysis you performed, do you have any opinion as
3 to whether the statement that I just read you in
4 paragraph 44 of the amended complaint is accurate?
5 MR. KALTENBACH: Objection as to
6 foundation and form and calls for the witness -- to
7 the extent it might call for the witness to make an
8 opinion.
9 BY THE WITNESS:
10 A It would appear to me that they were
11 overallocated interest income.
12 BY MR. HOFFMAN:
13 Q So it's your opinion based on your
14 analysis and your professional background that
15 District 204 received a little over \$1.5 million in
16 interest income from the TTO during these years more
17 than it should have, correct?
18 MR. KALTENBACH: Objection. Form.
19 Foundation. Calls for --
20 BY MR. HOFFMAN:
21 Q Am I correct? Is that correct?
22 A The numbers --
23 MR. KALTENBACH: Same objection. You
24 can answer.

Page 112

1 MR. HOFFMAN: Please stop interrupting
2 the witness and let her answer already.
3 MR. KALTENBACH: Hold on a minute, Jay.
4 MR. HOFFMAN: Come on, Barry.
5 MR. KALTENBACH: No, Jay. You asked a
6 question. I have to get my objection on the record
7 before she answers as a general rule. You keep --
8 every time I ask -- I object, you then throw in
9 another question. You ask a question, I object, she
10 answers.
11 BY MR. HOFFMAN:
12 Q Okay. You can go ahead and answer.
13 A I don't even remember the question
14 anymore. There's been so many conversations going
15 on back and forth.
16 Q Okay. You can read it back.
17 (WHEREUPON, the record was read
18 by the reporter as requested.)
19 BY MR. HOFFMAN:
20 Q Go ahead.
21 MR. KALTENBACH: Are you reasking the
22 question she just read?
23 MR. HOFFMAN: I want her to answer the
24 question that the court reporter just read back.

Page 113

Page 115

1 Are you going to interrupt your witness again?
2 MR. KALTENBACH: First of all --
3 MR. HOFFMAN: She just read your
4 objection again. So how many times do you want to
5 go through this?
6 MR. KALTENBACH: Well, how about we
7 don't talk over each other, first of all, because I
8 think that's pretty fair. I'm trying to figure out
9 what question you're asking her because the court
10 reporter just read at least two different questions
11 back.
12 MR. HOFFMAN: She did not.
13 MR. KALTENBACH: Okay. We disagree.
14 BY MR. HOFFMAN:
15 Q Is that correct? That's -- answer the
16 question, please, or do you want it read back one
17 more time?
18 A Could you read just the larger question
19 without all of the noise after it, please?
20 MR. HOFFMAN: Thank you. I agree that
21 would be helpful.
22 (WHEREUPON, the record was read
23 by the reporter as requested.)
24 MR. KALTENBACH: Same objection. You

1 BY MR. HOFFMAN:
2 Q All right. So let's start with -- tell
3 me what these materials are generally, please.
4 A So these two are Mr. Healy's interest
5 sheets.
6 Q Okay. So would you please take my
7 beloved Sharpie and write on the actual exterior of
8 the Redwell file what is contained in that Redwell
9 and then write your name and the date, please.
10 A So they're asserting that they brought
11 1993 through 2000 in this first folder.
12 Q It has a yellow Post-It note --
13 MR. KALTENBACH: Right. That's not
14 Kelly's handwriting.
15 BY MR. HOFFMAN:
16 Q There's a yellow Post-it note taped to
17 this folder that says, "quarterly distribution of
18 interest produced," and it's got the word "not"
19 crossed off and it has 7-15-15 and then "some to be
20 replaced done 1993 and 2000 1 of 2." And then the
21 next Redwell says -- says, "quarterly distribution
22 of interest 2000 to '12, 2 of 2." So these work
23 together, yes, these two Redwells?
24 A Yes.

Page 114

Page 116

1 can answer.
2 BY THE WITNESS:
3 A Yes.
4 MR. HOFFMAN: Thank you.
5 MR. KALTENBACH: Jay, it's been another
6 hour. Do you want to take a short break?
7 MR. HOFFMAN: Absolutely. Let's do it.
8 (WHEREUPON, there was a short
9 recess taken.)
10 BY MR. HOFFMAN:
11 Q Back on the record, please. All right.
12 Would you be kind enough to tell me what are
13 contained in the additional files that you and your
14 counsel brought with you today which are contained
15 in three Redwell folders and then some
16 binder-clipped spreadsheets?
17 And why don't we run through them one by
18 one. And this is where my Sharpie is going to come
19 in handy assuming the -- oh, dear. I just saw it.
20 MR. KALTENBACH: Did you take it back to
21 your office?
22 (WHEREUPON, discussion was had
23 off the record.)
24

1 MR. KALTENBACH: And that's just I think
2 because it's a recycled Redwell.
3 MR. HOFFMAN: Okay. Wherever it says
4 WaMu exhibits, that has nothing to do with this
5 case. Let's cross that out, shall we?
6 MR. KALTENBACH: That's fine.
7 MR. HOFFMAN: And this Di Bernardino has
8 nothing to do with the case either.
9 MR. KALTENBACH: No. Just a recycled
10 Redwell.
11 MR. HOFFMAN: Let's cross that out.
12 Glad to see it being recycled.
13 BY MR. HOFFMAN:
14 Q So write on these Redwells what they
15 are, please. All right. And can you put No. 1 on
16 Redwell No. 1 and No. 2 on Redwell No. 2, please.
17 And then would you put your name on both
18 of those so we know the source of them and the date
19 of today which is October 25, 2016.
20 And then mark this as 5 and 6.
21 (WHEREUPON, the folders were
22 marked for identification as
23 Bradshaw Deposition Exhibit
24 Nos. 5 and 6.)

Page 117

Page 119

1 BY MR. HOFFMAN:
2 Q Okay. So we marked as Bradshaw Exhibit
3 No. 5 the Redwell marked as Healy quarterly interest
4 sheets No. 1. And we marked as Bradshaw Exhibit
5 No. 6 the Redwell marked as Healy quarterly interest
6 sheets No. 2.
7 Are these your original documents or
8 are these copies?
9 A They appear to be copies.
10 MR. HOFFMAN: Okay. And what I would
11 like to do is have these copied. And I'd like the
12 copies to go to you and me, Barry, and then have the
13 originals be part of the transcript. Is that all
14 right? Or would you like me to make a copy --
15 MR. KALTENBACH: We'll figure it out.
16 MR. HOFFMAN: Obviously I want this -- I
17 want these part of the record and I want to get a
18 copy. So you and I will figure out some way to do
19 this.
20 BY MR. HOFFMAN:
21 Q So let's talk about the Healy quarterly
22 interest sheets. What are these and what part do
23 they play in your analysis, please?
24 A So the quarterly interest sheets were

Page 118

1 used to compile the columns in interest allocation
2 2 --
3 MR. KALTENBACH: Refer to the exhibit
4 number.
5 BY THE WITNESS:
6 A I'm sorry. Exhibit No. 3. So the date,
7 the 204 FB per RH --
8 BY MR. HOFFMAN:
9 Q Yes.
10 A -- the total average FB and the column
11 that says income.
12 Q Right. Why is the column that says
13 income a round number for all of these entries at
14 least on the first page of your spreadsheet?
15 Actually on both pages of the spreadsheet that
16 you're referring to.
17 A That's the number I compiled from the
18 Healy interest sheets. I can't speak to why the
19 number is what it is.
20 Q Well, isn't it impossible for the actual
21 interest that the TTO earned on its investments,
22 impossible for it to have been a round number to the
23 nearest 50,000 or thousand dollar in all of the
24 fiscal years 1995 through 2012?

1 A I can't speak to that as I was just
2 taking the number off of Healy's interest sheets.
3 Q But so what you're saying is these could
4 be -- all of these statements of income from Healy's
5 interest sheets could all be exactly the amount of
6 interest that the TTO earned in each of these
7 quarters?
8 A I can't speak to whether they were
9 earned or not. This is the number that he was
10 asserting to distribute.
11 Q But the amount that Healy intended to
12 distribute wasn't necessarily a percentage of the
13 amount of money that was actually earned, was it?
14 A I can't speak to whether it is or it
15 isn't.
16 Q Doesn't that have an impact on whether
17 your analysis supports a claim of \$1.5 million
18 overpayment to District 204?
19 A That isn't what I was asked to do. I
20 was asked to compile from the -- the amount that he
21 wanted to distribute, what the differences were.
22 Q Right. But in order to best determine
23 how much District 204 deserved to be paid each year
24 from the income earned, you would have to know

Page 120

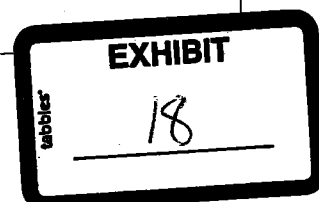
1 exactly how much income was earned and then exactly
2 what percentage District 204 was entitled to get,
3 right?
4 A I can't speak to what the process should
5 have been. All I can do is take the number that he
6 said he was distributing.
7 Q The fact that in every single quarter
8 it's a round number, doesn't that indicate that
9 Healy's numbers are all approximations in terms of
10 the income earned?
11 A I can't speak to that.
12 Q So, in your opinion, there's about, oh,
13 30 numbers on the income column in the second and
14 third pages of Bradshaw Exhibit 2 and every single
15 one of them end in 000. Do you see that?
16 A Yes.
17 Q And so your statement is you don't know
18 whether or not those numbers are exact amounts of
19 income that was earned by the TTO in those years.
20 You can't tell?
21 A I cannot tell.
22 Q In your professional opinion, they could
23 be amounts actually earned and they could be
24 estimates, you don't know?

EXHIBIT 18

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)
TOWNSHIP 38 NORTH RANGE 12)
EAST)
Plaintiffs,) No. 13 CH 23386
vs.)
LYONS TOWNSHIP HIGH SCHOOL)
DISTRICT NO. 204,)
Defendants.)

The deposition of MARTIN TERPSTRA, taken
before JO ANN LOSOYA, C.S.R., pursuant to the
provisions of the Illinois Code of Civil Procedure
and the Rules of the Supreme Court thereof
pertaining to the taking of depositions for the
purpose of discovery at 225 West Washington Street,
Chicago, Illinois commencing at 1:30 p.m. on
May 24, 2017.



<p style="text-align: right;">Page 2</p> <p>1 PRESENT:</p> <p>2</p> <p>3 MILLER CANFIELD PADDOCK & STONE, PLC</p> <p>4 MR. BARRY P. KALTENBACH</p> <p>5 225 West Washington Street</p> <p>6 Suite 2600</p> <p>7 Chicago, Illinois 60606</p> <p>8 (312) 460-4200</p> <p>9 Appeared on behalf of Plaintiffs.</p> <p>10</p> <p>11 HOFFMAN LEGAL</p> <p>12 MR. JAY R. HOFFMAN</p> <p>13 20 North Clark Street</p> <p>14 Suite 2500</p> <p>15 Chicago, Illinois 60606</p> <p>16 (312) 899-0899</p> <p>17 jay@hoffmanlegal.com</p> <p>18 Appeared on behalf of Defendants.</p> <p>19</p> <p>20 ALSO PRESENT:</p> <p>21 MR. JAMES P. MARTIN,</p> <p>22 CENDROWSKI CORPORATE ADVISORS</p> <p>23</p> <p>24 REPORTED BY: JO ANN LOSOYA</p> <p>LICENSE #: 084-002437</p>	<p style="text-align: right;">Page 4</p> <p>1 (Witness sworn.)</p> <p>2 WHEREUPON:</p> <p>3 MARTIN TERPSTRA,</p> <p>4 called as a witness herein, having been first duly</p> <p>5 sworn, was examined and testified as follows:</p> <p>6 EXAMINATION</p> <p>7 BY MR. KALTENBACH:</p> <p>8 Q. Could you please state your name for the</p> <p>9 record, sir?</p> <p>10 A. Martin Terpstra, T-E-R-P-S-T-R-A.</p> <p>11 Q. Mr. Terpstra, I take it you have been</p> <p>12 deposed before?</p> <p>13 A. Yes.</p> <p>14 Q. I'm not going to cover all the rules</p> <p>15 then. If at any time you need a break, and I know</p> <p>16 you're kind of losing your voice a little bit,</p> <p>17 please let us know. We will be happy to take a</p> <p>18 break. Just answer the question that is pending</p> <p>19 before we take a break. Is that okay?</p> <p>20 A. Absolutely.</p> <p>21 (Document marked as Deposition</p> <p>22 Exhibit No. 1.)</p> <p>23 BY MR. KALTENBACH:</p> <p>24 Q. I'm handing you what is marked Exhibit 1</p>
<p style="text-align: right;">Page 3</p> <p>1 EXAMINATION</p> <p>2 Witness Page Line</p> <p>3 ALBERT KUNICKIS</p> <p>4 By Mr. Kaltenbach 4 7</p> <p>5</p> <p>6 *****</p> <p>7 EXHIBITS</p> <p>8 Deposition Exhibit Page Line</p> <p>9 Exhibit No. 1..... 4 22</p> <p>10 Exhibit No. 2..... 8 22</p> <p>11 Exhibit No. 3..... 13 7</p> <p>12 Exhibit No. 4..... 18 2</p> <p>13 Exhibit No. 5..... 54 13</p> <p>14 Exhibit No. 6..... 77 3</p> <p>15 Exhibit No. 7..... 110 19</p> <p>16</p> <p>17 ***ORIGINAL EXHIBITS RETAINED BY COUNSEL***</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 5</p> <p>1 which is a document that Mr. Hoffman emailed to me,</p> <p>2 I don't know, maybe a week or two ago. Is this the</p> <p>3 engagement agreement between your company, and</p> <p>4 Mr. Hoffman's law firm regarding your expert</p> <p>5 services in this litigation?</p> <p>6 A. Yes.</p> <p>7 Q. Is this the entire agreement?</p> <p>8 A. Yes.</p> <p>9 Q. What was your assignment, sir, when you</p> <p>10 were hired?</p> <p>11 A. My assignment was to review and evaluate</p> <p>12 documents that were provided to us. We were going</p> <p>13 to try to see if we could determine certain amounts</p> <p>14 of interest, paid and allocated, and then the</p> <p>15 understanding was that at a certain point in time we</p> <p>16 would be responding to an opposing expert report.</p> <p>17 Q. Are you familiar with Cendrowski</p> <p>18 Corporate Advisors?</p> <p>19 A. Yes.</p> <p>20 Q. Do you have an opinion as to the quality</p> <p>21 of work product of that firm does?</p> <p>22 A. I have no opinions.</p> <p>23 Q. You don't know anything bad about them?</p> <p>24 A. No.</p>

Page 30

1 Q. We're going to kind of flip back and
2 forth a little bit between those two. I would ask
3 that if you could also kind of flip to Exhibit B.
4 You can certainly look at the copy you brought if
5 you want. As long as it's the same thing, I'm fine
6 with that.
7 That's fine. There's a couple of
8 things highlighted I think but I don't care about
9 that. If that's easier for you, I'm all for it.
10 A. I can put the two side by side which
11 would be easier.
12 Q. If you could do it that way, that's
13 great. In your second paragraph you state that
14 based on Plante Moran's analysis of the audited
15 financial statements, it appears that TTO earned in
16 excess of a million dollars -- TTO earned an excess
17 of a million dollars in investment income that has
18 not been allocated. That's for that '95 through '07
19 period, right?
20 A. That is correct.
21 Q. The "in excess of a million" if we look
22 at Exhibit B, is that the \$1,112,973 number?
23 A. That is correct.
24 Q. So, is it your opinion, that between

Page 31

1 fiscal years -- I don't want to say that. For the
2 period encompassed by fiscal years '95 through '07,
3 there is in excess of \$1,112,973 in interest income
4 that was not distributed?
5 MR. HOFFMAN: Object to the form of the
6 question, which doesn't refer to the financial
7 statements, and therefore, is contrary to the
8 witness' testimony.
9 MR. KALTENBACH: I would appreciate it if
10 you would keep your objections a little shorter.
11 I'm not trying to trick the witness. I would
12 appreciate it.
13 MR. HOFFMAN: You are, obviously.
14 THE WITNESS: Can you repeat the question
15 at this point in time.
16 BY MR. KALTENBACH:
17 Q. Let me do this: Is it your opinion,
18 based on your review of the audited financial
19 statements for the period encompassed by fiscal
20 years '95 to '07, that the TTO has \$1,112,973 in
21 interest income it has not allocated?
22 MR. HOFFMAN: Object to the form of the
23 question.
24

Page 32

1 BY THE WITNESS:
2 A. What we're trying to show in this
3 schedule is we go to the audited financial
4 statements, and then we report what the net earnings
5 on investments were, or in certain years, we have
6 gross interest earned, then we subtract interest
7 paid, and then you come up with net earnings on
8 investment.
9 What we start with is we start with a
10 running balance, so to speak in the final column of
11 the schedule, and it shows that the auditors
12 reported in the fiscal '95 that there was \$855,499
13 in interest that was earned that had not been
14 distributed, and so we go through and add and
15 subtract the net amounts, and that during that
16 period, the running balance would be \$1,112,973.
17 Q. This analysis, is it based solely on the
18 audited financial statements for this period of
19 time?
20 A. This is based solely from information
21 that we abstracted from the TTO's audited financial
22 statements.
23 Q. Okay. I think I see what you are doing
24 here. So for -- let's look at '97 through 2003.

Page 33

1 You have a note "A" next to those years, correct?
2 A. That is correct.
3 Q. And the note A below, you explain it's
4 the net of distribution, correct?
5 A. Right.
6 Q. So, that was -- did the audited financial
7 statements just show the net?
8 A. That is correct.
9 Q. Okay. And then for '04 through '07, it
10 showed the total earned and then it showed the
11 amount allocated. So that you then calculated the
12 net yourselves?
13 A. We calculated the net ourselves and for
14 '95 and '96, the financial statements appear to be a
15 net amount, but the auditors in those years did not
16 spell out that it was a net interest on investments
17 net of distributions.
18 Q. Is your opinion -- are you comfortable
19 basing your opinion then for '95 and '96 -- is it
20 your opinion -- Strike that.
21 Given it is not spelled out, does
22 that impact your opinion as an expert at all with
23 respect to the \$1 million number?
24 A. It does not because the consistency in

Page 34

1 format with the years in which they do give the
2 explanation, there's a continuity there that appears
3 to be the same. When we get down to '04 through
4 '07, there they spell out the amounts separately.
5 Q. Okay. And why didn't you go back prior
6 to fiscal year '95?
7 A. Those were the only financial statements
8 that we had available to us.
9 Q. And why didn't you go forward from fiscal
10 year 2008 -- starting with year '08?
11 A. Because after fiscal 2007, the auditors
12 no longer provided that information as we describe
13 in my report.
14 Q. So, the \$1,112,973 -- let me backup. Are
15 you offering any opinion as to whether the numbers
16 on Exhibit B are correct?
17 A. Well, these are numbers that we have
18 abstracted from the TTO's audited financial
19 statements. So, these would be representations by
20 the TTO and these representations were audited by
21 Baker Tilly and its predecessor firms, and Baker
22 Tilly gave an opinion that the amounts were fairly
23 presented. So, I will make the assumption that
24 these are good numbers.

Page 35

1 Q. Okay. You are not expressing an opinion
2 as to the reliability of the Baker Tilly's work, are
3 you?
4 A. I am not.
5 Q. You are not expressing an opinion that
6 the statements were properly or improperly audited,
7 correct?
8 A. I am giving no representations. I have
9 not had the privilege of reviewing Baker Tilly's
10 audit workpapers.
11 Q. Your opinion is based on the audited work
12 of Baker Tilly, and you are comfortable expressing
13 your opinion to a reasonable degree of certainty
14 relying upon that, correct?
15 A. Right.
16 MR. HOFFMAN: Objection to the form of
17 the question insofar as it tries to restate the
18 witness' prior testimony in a different way.
19 BY THE WITNESS:
20 A. Well, the financial statements belong to
21 the TTO. So, in any audit, the financial statements
22 belong to management, they belong to the client.
23 The auditor's report is the auditor's opinion on
24 whether the financial statements are fairly

Page 36

1 presented. So, Baker Tilly and its predecessor said
2 the TTO's financial statements were fairly
3 presented. So these are numbers that the TTO is
4 representing as their financial results, and Baker
5 Tilly is saying based upon their audit, they believe
6 those amounts are fairly presented.
7 Q. So as to -- we don't know -- assuming
8 that this analysis is correct, we don't know what
9 that 1 million plus is today, do we?
10 A. We know what the number was as of June
11 30, 2007; and for whatever reason, the TTO and its
12 auditors stopped presenting this information in its
13 annual financial statements beginning with fiscal
14 2008.
15 Q. But I -- it is correct, sir, that we
16 don't know what that number is today, right?
17 A. So, what the number would be as of --
18 well, the most recent fiscal year end would have
19 been June 30, 2016, and I have not looked at the
20 financial statements for that year, and I don't know
21 if the amounts are disclosed or not as of that point
22 in time. We do know that Dr. Birkenmayer testified
23 that there was an amount of money in excess of a
24 million dollars. I believe she testified that an

Page 37

1 amount from prior years of approximately
2 \$1.3 million had been, I guess, discovered by Miller
3 Cooper, who were new auditors for the TTO in fiscal
4 2013, and they made Dr. Birkenmayer and the TTO
5 aware of the fact that there was a significant
6 amount of undistributed money; and from what I
7 understand, there was a \$500,000 distribution and
8 that other funds were still retained by the TTO and
9 not distributed to the districts.
10 Q. So, I'd appreciate it if you could give
11 me a yes or no answer on this. We don't know what
12 that amount is today, correct?
13 MR. HOFFMAN: Object to the form of the
14 question; also asked and answered.
15 BY THE WITNESS:
16 A. I was going to ask you to clarify. What
17 the amount would be as of what date? As of -- as of
18 today, May, 2017.
19 Q. As of year end, at any point past
20 June 30, 2007, fiscal year end.
21 A. We would know what the number would have
22 been as of a certain point in fiscal 2013. Dr.
23 Birkenmayer testified that the amount was
24 approximately \$1.3 million, but subsequent to that

Page 38

1 point in time, we probably don't know.
2 Q. We don't know what the amount was as of
3 June 30, 2008, correct? We don't have that anywhere
4 on Exhibit B?
5 A. The TTO did not publish that amount in
6 its financial statements, and it was not disclosed
7 in the audited financial statements.
8 Q. The \$1,112,973, who owns that?
9 A. That amount, based upon my understanding,
10 would belong to the districts.
11 Q. And 204, therefore, would own a
12 percentage of that, correct?
13 A. They would own, whether it was 25 to
14 30 percent, whatever their percentage would have
15 been at that particular date and time.
16 Q. And so if there is a distribution, 204
17 should get their percentage of that distribution,
18 correct?
19 A. If there's an amount to be distributed,
20 204 should get its distributable share.
21 Q. Are you opining that the TTO should make
22 a distribution of \$1,112,973?
23 A. At this point in time, a number from 2007
24 is probably not relevant.

Page 39

1 Q. In your report, on Page 6, we're still on
2 the second bullet point, you say -- it's the last
3 sentence. You say, "the TTO should have allocated
4 the undistributed investment interest based on the
5 districts' fund balances at the time the earnings
6 became available during the relevant period and take
7 those distributions into account in the context of
8 its claim in this case."
9 How should the TTO have taken those
10 distributions into account, sir?
11 A. What I'm saying is that any undistributed
12 amounts should be allocated to the districts on a
13 timely basis at the end of each fiscal year end.
14 So that to the extent that there
15 would be any undistributed funds at the end of each
16 fiscal year end, those amounts should be distributed
17 to the districts. So that at any fiscal year end,
18 whatever the undistributed amount should be should
19 be allocated to the districts.
20 Q. Is that an opinion that you are offering
21 today that at the end of each fiscal year, those
22 amounts should, in fact, be allocated?
23 A. Right, because those amounts belong to
24 the districts.

Page 40

1 Q. So, how does -- I understand how that
2 works where there is a positive in the running
3 balance. What about years in which there is a
4 negative in the running balance. For instance, in
5 your Exhibit B -- I'm sorry. You prepared Exhibit B
6 or someone at Plante Moran did, correct?
7 A. Yes, we prepared this.
8 Q. If we look at fiscal year ending June 30
9 of 2001, it shows a negative \$443,212; is that
10 correct?
11 A. That is correct.
12 Q. So what should be done with that number?
13 MR. HOFFMAN: You mean today?
14 MR. KALTENBACH: No, back then.
15 MR. HOFFMAN: What should have been done?
16 MR. KALTENBACH: Yes.
17 BY THE WITNESS:
18 A. Back then, there should have been an
19 allocation journal entry to recoup those amounts
20 because they obviously over allocated during that
21 year.
22 Q. So that that \$443,212 in the red that's a
23 deficit, correct?
24 A. That would be an over allocation.

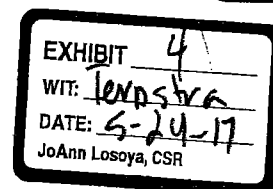
Page 41

1 Q. Is there a deficit today for the township
2 treasurer?
3 A. Are we talking about on May whatever
4 today is of 2017?
5 Q. We can -- at any point within the last
6 year, let's just say. I'm not trying to isolate it
7 to a particular day. Is there a currently a
8 deficit?
9 A. I haven't looked at the most recent
10 financial statements, so I'm not going to speculate
11 or venture on that.
12 Q. If there is a deficit, wouldn't the
13 districts own that deficit in the same percentages?
14 MR. HOFFMAN: Object to the form of the
15 question, also beyond the scope of anything involved
16 in this case, and beyond the scope of the
17 assignment.
18 BY THE WITNESS:
19 A. Only with respect to investment income
20 funds. If the TTO runs a deficit on its own, that
21 would be separate and apart from the investment
22 pool. What I'm talking about here is strictly
23 limited to the investment pool.
24 Q. We will move on to the third bullet

<p style="text-align: right;">Page 42</p> <p>1 point -- or we've been going about 50 minutes. Do 2 you want to take a break?</p> <p>3 MR. HOFFMAN: What would you like to do?</p> <p>4 MR. KALTENBACH: We usually do a break 5 about every hour.</p> <p>6 THE WITNESS: I'm able to keep rolling.</p> <p>7 MR. HOFFMAN: Let's roll.</p> <p>8 MR. KALTENBACH: That's fine. It was at 9 a natural stopping point.</p> <p>10 MR. HOFFMAN: Thank you.</p> <p>11 BY MR. KALTENBACH:</p> <p>12 Q. Let's look at -- so we will move onto the 13 third bullet point, which is on Page 6. Your 14 summary for this opinion is Healy's handwritten 15 sheets were estimates and subject to revision; is 16 that correct, sir?</p> <p>17 A. That is correct. And that's what 18 Mr. Healy testified to.</p> <p>19 Q. Let's flip to Exhibit J of your report 20 for a minute if we can. And J, it's actually -- we 21 will look at Exhibit J later on in more detail, but 22 Exhibit J is a two-page exhibit actually, correct?</p> <p>23 A. That is correct.</p> <p>24 Q. And the first page, which looks like a</p>	<p style="text-align: right;">Page 44</p> <p>1 and then he would estimate what would be 2 distributable for that specific period of time. And 3 then he would do an allocation.</p> <p>4 So, in this particular period, he was 5 going to distribute \$1,240,000, and then it so 6 happens that District 109 also received an 7 additional amount in that period.</p> <p>8 So, it appears as if he allocated 9 \$1,240,000 and then for a reason probably known only 10 to Mr. Healy, District 109 received an additional 11 amount.</p> <p>12 Q. So I know in this sheet, it looks like 13 Healy has percentages written in column 3, right? 14 That's what you were referring to earlier?</p> <p>15 A. That is correct.</p> <p>16 Q. A lot of his other sheets don't have 17 percentages, right? If you turn -- Exhibit K, it 18 doesn't seem to have the percentages?</p> <p>19 A. Exhibit K does not have it and he's 20 inconsistent.</p> <p>21 Q. So on this sheet -- your opinion is that 22 his handwritten sheets -- the summary of your 23 opinion on bullet point 3 is that Healy's 24 handwritten sheets were estimates and subject to</p>
<p style="text-align: right;">Page 43</p> <p>1 printed chart, is that something that your firm 2 created?</p> <p>3 A. Yes, it is.</p> <p>4 Q. And the second page, are those the Healy 5 handwritten sheets that you are referring to?</p> <p>6 A. These are the Healy handwritten sheets.</p> <p>7 Q. Can you explain your understanding of 8 this handwritten sheet to me?</p> <p>9 MR. HOFFMAN: Object to the form of the 10 question.</p> <p>11 MR. KALTENBACH: That is what is it 12 showing?</p> <p>13 MR. HOFFMAN: Okay. No objection.</p> <p>14 BY THE WITNESS:</p> <p>15 A. My understanding is that when Mr. Healy 16 prepared his allocations, which were periodic, 17 generally four times throughout the course of a 18 year, Mr. Healy would prepare one of these sheets, 19 and he would list the district numbers. Then he 20 would list what he considered to be or what he 21 calculated to be the average balance in the pool 22 based on the number of months. Then he would 23 calculate a percentage with each district owning a 24 certain share coming down to a total of 100 percent,</p>	<p style="text-align: right;">Page 45</p> <p>1 revision. So what of this in your opinion was an 2 estimate and subject to revision?</p> <p>3 A. The estimate ultimately is the amount 4 that he's distributing during the period.</p> <p>5 Q. And that is based on his deposition 6 testimony?</p> <p>7 A. It is based on his deposition testimony 8 as well as deposition testimony of others.</p> <p>9 Q. As an example here, the sum of the 10 distributions is \$124,000.</p> <p>11 MR. HOFFMAN: Excuse me.</p> <p>12 MR. KALTENBACH: I'm sorry.</p> <p>13 THE WITNESS: \$1,240,000.</p> <p>14 BY MR. KALTENBACH:</p> <p>15 Q. \$1,240,000 and then it looks like another 16 \$3,208.</p> <p>17 A. It's 32,080 got distributed to --</p> <p>18 Q. I'm sorry. You're right.</p> <p>19 A. -- to the District 109.</p> <p>20 Q. That's how we get to \$1,272,000.</p> <p>21 A. To \$1,272,000.</p> <p>22 Q. Okay. Do you have an opinion, sir, on 23 whether or not these handwritten sheets constitute 24 business records?</p>

<p style="text-align: right;">Page 46</p> <p>1 MR. HOFFMAN: Objection, calls for a 2 legal conclusion. 3 BY THE WITNESS: 4 A. What these would appear to me as an 5 accountant would be a workpaper used by Mr. Healy to 6 perform a calculation that would be used to support 7 the allocation of interest or other investment 8 earnings during that particular period of time. And 9 these amounts would generally be entered into the 10 general ledger. 11 Q. Do you have an opinion as to whether or 12 not Mr. Healy created these worksheets in the 13 ordinary course of business? 14 A. My understanding is he prepared 15 workpapers like this throughout most of the relevant 16 period, and that there seems to be some continuity, 17 although my report notes many exceptions to what 18 would be normal calculations throughout the years, 19 but, generally, Mr. Healy would prepare at least 20 four of these per year. 21 Q. Okay. Each quarter in accordance with 22 the quarterly allocations? 23 A. But not necessarily truly calendar 24 quarters. They're quarters that meet his</p>	<p style="text-align: right;">Page 48</p> <p>1 on the general ledger? 2 A. My understanding from Mr. Martin's 3 testimony, and that's what I have to rely upon, 4 since we did not have the chance -- the opportunity 5 to discuss it, based on his testimony, my 6 understanding is that he relied upon the handwritten 7 sheets. 8 Q. Okay. In your -- I want to go back to 9 some -- 10 MR. HOFFMAN: Please excuse me for a 11 second. 12 (Discussion had off the record.) 13 MR. KALTENBACH: There wasn't a question 14 pending so I don't have a problem with you and 15 Mr. Hoffman talking. 16 MR. HOFFMAN: Go ahead. 17 MR. KALTENBACH: Okay. If he wants to 18 correct something he said, I would like to give him 19 a chance now. 20 MR. HOFFMAN: I thought there was an 21 ambiguity in your question, but it's up to the 22 witness to determine that. 23 BY MR. KALTENBACH: 24 Q. Did you -- do you want -- let me do this</p>
<p style="text-align: right;">Page 47</p> <p>1 distribution cycle. 2 Q. Okay. Did Mr. Martin, in his opinion, 3 did rely on -- let me backup a minute. 4 On this particular document, Exhibit 5 J, the amount that Healy -- what is your 6 understanding of what is depicted in column 4? 7 A. In column 4, that would be the allocation 8 that Mr. Healy made to each of the districts and he 9 allocated \$1,240,000 and gave an additional amount 10 to District 109 of an additional \$32,000. So he 11 allocated \$1,240,000 and then added an additional 12 amount for District 109. So my understanding is 13 that there would have been \$1,272,080 distributed as 14 a result of this document. 15 MR. HOFFMAN: We'll take a break now. It 16 has been exactly an hour. 17 MR. KALTENBACH: Okay. That's fine. 18 (Whereupon, a break in the 19 proceedings was taken.) 20 BY MR. KALTENBACH: 21 Q. Mr. Terpstra, when Mr. Martin was 22 determining how much had been allocated to the 23 member districts, did he rely on the numbers that 24 are depicted in column 4 of Exhibit J or did he rely</p>	<p style="text-align: right;">Page 49</p> <p>1 because I want to make sure I'm not being unfair 2 with my question of you. 3 In determining what was actually 4 distributed to the member districts, is it your 5 understanding that Mr. Martin used the numbers that 6 on Exhibit J happened to be depicted in column 4? 7 A. My understanding is based upon my 8 Martin's testimony, he testified that he relied on 9 Healy's handwritten notes as to what should have 10 been distributed, and that's what -- and he further 11 testified that he actually used the numbers that 12 Healy had calculated on the handwritten sheets 13 saying that he believes that's what should have been 14 distributed based upon his reliance on the 15 handwritten sheets. 16 Q. So, just by way of example, so we're 17 clear, if you could, I'm sorry, flip back the 18 Exhibit J just for a split second. The handwritten 19 sheet part of Exhibit J. 20 A. Okay. 21 Q. We will just look at the first entry 22 District 101, the amount that should have been 23 distributed, as you understand it, based on Healy's 24 handwritten notes is the \$68,168, correct?</p>

EXHIBIT 19



A. Introduction

I was engaged by Hoffman Legal, on behalf of Lyons Township High School District No. 204 ("LT"), to evaluate and respond to the disclosures and deposition testimony of Plaintiff's expert, James P. Martin ("Martin") of Cendrowski Corporate Advisors LLC, on behalf of Township Trustees of Schools Township 38 North, Range 12 East (collectively "TTO" or "Plaintiff").

In completing this engagement, I and/or staff working under my direction have read and analyzed various pleadings, reports, records, correspondence, and relevant documents, as described below and in Section E of this report. This report is based on information made available to me through May 4, 2017. As additional information becomes available, I reserve the right to amend and modify this report.

My hourly rate for this engagement is \$350. Others working under my direction are billed at hourly rates between \$50 and \$330. Our fees are not contingent on the outcome of this matter.

B. Professional Qualifications

I am a partner in the Forensic & Valuation Services Group of Plante & Moran, PLLC ("PM"). PM is ranked by *Accounting Today* in its 2017 survey as the 15th largest certified public accounting and management consulting firm in the United States.

I am a Certified Public Accountant ("CPA"), Certified Fraud Examiner ("CFE"), and Chartered Global Management Accountant ("CGMA") with over 40 years of experience as an auditor, consultant and fraud examiner covering many diverse industries. For the first 15 years of my professional career, I served in the Audit Department of Altschuler, Melvoin & Glasser LLP ("AM&G"), where I focused on audits of clients in a wide range of industries, including governmental entities. In April 1990, I transferred into AM&G's Litigation Services Group. I joined Blackman Kallick LLP ("BK") in September 2006 to lead its Forensic and Litigation Services Group. On July 1, 2012, BK merged with PM.

Since 1990, I have focused my career on forensic and litigation services. I have worked with many attorneys in the area of professional liability litigation. I have also performed forensic accounting and fraud investigation services for clients in a wide range of industries.

I have investigated and evaluated over 800 professional liability claims against accountants, attorneys, directors and officers, and other professionals. These matters involved compliance with professional standards, financial analysis, and evaluation of alleged damages.

I have directed more than 200 forensic investigations involving misstatement of financial statements and misappropriation of corporate assets. These engagements include special investigations for boards of directors of publicly-traded companies, including representation before the Securities and Exchange Commission.

I served on AM&G's internal inspection teams to monitor the quality of its audit practice and external peer review teams to evaluate the audit practices of other public accounting firms. I also served on BK's risk management committee.

I have served as senior technical specialist for a national accounting and consulting firm serving colleges and universities, governmental entities, and not-for-profit organizations. I developed and taught a series of courses relating to accounting for colleges, universities and not-for-profit organizations. I have been a member of the Government Finance Officers Association, the National Association of College and University Business Officers, the National Association of Student Financial Aid Administrators, and the Association of School Business Officials.

I have served on the Federal Financial Assistance Committee and the Government Report Review Committee of the Illinois CPA Society and have extensive experience with federal and state grant programs. I participated in an Illinois CPA Society's task force to study revisions to federal audit guides.

I have developed risk management programs for accounting firms, which I present nationally to accounting firms and professional organizations. I have also developed training programs on fraud detection and prevention programs.

I am a member of the American Institute of Certified Public Accountants ("AICPA"), the Illinois CPA Society ("ICPAS"), and the Association of Certified Fraud Examiners ("ACFE"). I currently serve on the Ethics Committee of the ICPAS.

I am a frequent speaker for professional organizations and I serve as an adjunct faculty member at Benedictine University teaching courses in forensic accounting and fraud investigation, as part of its Graduate Business Programs.

I earned a Bachelor of Science in Accounting (Magna Cum Laude) in 1975 and a Master of Accountancy (With Distinction) in 1998 from DePaul University.

A copy of my curriculum vitae is attached as Exhibit A and further sets forth my qualifications.

C. Background

We understand the following facts from our review of the TTO's amended complaint:

- The TTO is a corporate entity organized under the laws of the State of Illinois with its principal office in La Grange, Illinois.
- LT is a corporate entity organized under the laws of the State of Illinois with its principal office in La Grange, Illinois.
- The Illinois School Code, 105 ILCS 5/1 *et seq.* ("School Code") holds that Township Trustees, elected by and responsible to the voters of Lyons Township, appoint the Lyons Township School Treasurer ("Treasurer") to serve as the statutorily-appointed treasurer for LT and other educational districts (collectively "Districts") within Lyons Township.

- During the fiscal years 1995 through 2012 ("Relevant Period"), Robert Healy ("Healy") served as Treasurer.
- Among other tasks, the Treasurer takes custody of public funds (property taxes and other funds) for the benefit of the Districts and pays amounts to persons and entities as it is lawfully instructed to pay by the Districts it serves.
- The School Code imposes upon the Treasurer the responsibility to account for all receipts, disbursements, and investments arising out of the operations of all the Districts served by the TTO.
- The School Code also requires the Treasurer to prepare and submit a biannual statement showing the investment proceeds, other income received, and distributions of funds on hand.
- The School Code, Section 8-7, governs the depositing and investing of school funds. It allows the Districts' monies to be combined. Those funds are to be "accounted for separately in all respects, and the earnings from such investment shall be separately and individually computed and recorded, and credited to the fund or school district ... for which the investment was acquired."
- The Treasurer commingles funds from the Districts for investment purposes and allocates the interest earned on the investments via journal entries. Funds are held in the custody of the Treasurer.
- The TTO claims that during the Relevant Period LT was over-allocated investment interest. Martin testified that the amount is \$1,427,442.

D. Summary of Opinions and Bases of Opinions

All of my opinions are stated within a reasonable degree of accounting certainty.

- The TTO and Martin are unable to determine with certainty annual investment earnings.

We would have expected that the TTO determined investment interest on pooled investments for the Districts by using source documentation such as bank and investment statements. Then, based on that information, we would anticipate the TTO to have calculated each District's allocation of the investment interest.

The recordkeeping at the TTO was such that Michael Theissen ("Theissen"), TTO President, testified that after Healy was terminated the TTO had to go through an exhaustive search to find and identify its investments, who held them, how they were managed, how much they were earning, and if they were in compliance with the statutory investment policy.¹

Theissen testified that he asked Kelly Bradshaw ("Bradshaw"), current TTO accountant, to compare the allocation of investment earnings for all of the Districts with Healy's notes to determine whether the quarterly allocations were proper.² Theissen further testified that he expected Bradshaw would trace the quarterly distribution amounts to source documents and that he would be concerned if Bradshaw only utilized internal TTO documents in her analysis.³

¹ Deposition of Michael Theissen at pages 86-87.

² Deposition of Michael Theissen at pages 87-88.

³ Deposition of Michael Theissen at page 102.

Dr. Susan Birkenmaier ("Dr. Birkenmaier"), the TTO's designated representative in this matter and its current Treasurer, testified that she does not know whether Bradshaw had gone back to look at what was actually earned by reviewing TTO bank and investment statements.⁴

Bradshaw testified that she did not go back to source documentation from banks and investment brokers, advisors, and other financial institutions, but would have had to in order to determine what the Districts actually earned for investment income during the Relevant Period.⁵

Martin attempted to, but was unable to, determine how much investment interest the TTO actually earned on pooled investments during the Relevant Period.⁶ Martin testified that for the earlier years only about 50 percent of the records were available and in the more recent years approximately 90 percent were available.⁷ Martin was unable to complete his analysis of earned investment interest and he does not believe, based on the documents available, that any other accounting firm could perform the analysis.⁸ As a result, Martin testified that he was unable to determine what share LT was entitled to receive during the Relevant Period.⁹

We attempted to locate source documents that supported a TTO-prepared statement that purported to show quarterly interest amounts. We were not able to locate all of the necessary documents. As such, based on the documents produced in this matter, it is not possible to determine investment interest with reasonable certainty due to the lack of available source documents.

- The audited financial statements demonstrate that there were additional funds that were available for distribution to the Districts on a net basis for the fiscal years 1995 through 2007.

Based on our analysis of the TTO's audited financial statements for the fiscal years 1995 through 2007, it appears that the TTO earned in excess of \$1 million of investment interest that had not been allocated to the Districts.¹⁰

The TTO's audited financial statements for fiscal 1995 through 2007 reported net earnings on investments. The presentation of the net earnings on investments changed during that time period. For fiscal years 1995 through 2003, the TTO reported earnings on investments net of distributions to Districts. For fiscal years 2004 through 2007, the TTO reported gross investment earnings and then deducted distributions to the Districts to report a net amount.

⁴ Deposition of Dr. Susan Birkenmaier at page 196.

⁵ Deposition of Kelly Bradshaw at page 89.

⁶ Deposition of James Martin at page 12.

⁷ Deposition of James Martin at pages 12-15.

⁸ Deposition of James Martin at page 15.

⁹ Deposition of James Martin at page 39.

¹⁰ Exhibit B.

During the thirteen fiscal years 1995 to 2007, in six years investment interest allocated to Districts exceeded investment interest earned, while in seven years investment interest allocated was less than investment interest earned. For example, during fiscal 2002, the TTO allocated approximately \$2 million dollars to Districts in excess of interest earned.¹¹ During fiscal 2003, the TTO earned interest of approximately \$3.3 million in excess of amounts allocated to Districts.¹² These examples demonstrate how the TTO earned in excess of \$1 million of investment interest that had not been allocated to the Districts.

For fiscal years 2008 through the present, the TTO did not report either gross or net earnings on investments. Dr. Birkenmaier, however, testified that in fiscal 2013 the TTO's auditor, Miller Cooper & Co., Ltd., determined there was undistributed investment interest held over from prior years of approximately \$1.3 million and that, but for a \$500,000 distribution, it is still being held by the TTO.¹³

Martin testified that he read the TTO's audited financial statements but did not utilize them to analyze the unallocated funds.¹⁴ He further testified that he did not perform any analysis to determine if undistributed investment income from the Relevant Period remains in the TTO's possession, as he did not believe that those funds would be relevant to his analysis.¹⁵

It is not possible to determine, from the TTO's audited financial statements alone, to which Districts the unallocated funds should be distributed. Martin, however, ignores both the evidence in the TTO's audited financial statements and Dr. Birkenmaier's testimony that there are additional funds available to be distributed to the Districts. The TTO should have allocated the undistributed investment interest based on the Districts' fund balances at the time the earnings became available during the Relevant Period and take those distributions into account in the context of its claim in this case.

- Healy's handwritten sheets were estimates and subject to revision.

Martin incorrectly assumes that Healy's calculations of allocable investment interest were the amounts that should have been distributed to the Districts. However, Healy's quarterly allocations of investment earnings to the Districts were estimates. Healy testified, "I often estimated the value, estimated the income, because the actual numbers weren't readily available."¹⁶

With regard to his quarterly allocations, Healy testified, "I could pretty much judge what was made in my head. And then I would make a conservative estimate for the first three periods of the fiscal year; and then at the end, the fourth was usually a large payment."¹⁷

¹¹ Exhibit C.

¹² Exhibit D.

¹³ Deposition of Dr. Susan Birkenmaier at pages 45-49.

¹⁴ Deposition of James Martin at page 22.

¹⁵ Deposition of James Martin at pages 125-129.

¹⁶ Deposition of Robert Healy at page 52.

¹⁷ Ibid.

Healy testified that the TTO's outside accountant, Cheryl Sudd ("Sudd"), "went back and reconciled and checked all the investment transactions to make sure that all income and few losses were properly recorded."¹⁸ Sudd was responsible for the bulk of the general ledger and she had assistance from the auditors (Baker Tilly and its predecessors).¹⁹

Healy testified that his allocations were reasonable estimates of what was available for distribution.²⁰ In order to determine the exact amounts that should have been allocated to each District, it would be necessary to use Sudd's exact numbers from the general ledger for all four quarters.²¹

Martin testified that he had no concerns relying on Healy's handwritten notes as being what should have been distributed.²² Martin actually used the numbers that Healy calculated on his handwritten sheet.²³

Based on Healy's testimony with regard to the use of estimates in the first three quarters of the fiscal year and the use of TTO staff and outside professionals to follow up on those estimates, it is not reasonable for Martin to rely on Healy's handwritten notes as a guide for what the TTO intended to distribute.

- Martin did not test Healy's handwritten notes for mathematical accuracy. He testified that "in all instances" Healy's calculation of taking the percentages and applying them to the total distribution arrived at Healy's interest allocation for LT.²⁴

Martin treated Healy's allocable interest calculations as a "business record that were correct at that time."²⁵ Martin testified that he relied upon the specific amounts that Healy set forth in his notes as the amount that each District should have been allocated in the applicable quarter.²⁶ However, Martin admitted that Healy testified that his handwritten notes were preliminary and conservative estimates and that they were subject to later adjustment by Sudd and the auditors.²⁷

The preliminary nature of Healy's notes is reflected in calculation errors within these notes. Our analysis of Healy's notes, which Martin accepted at face value, disclosed several quarters where his calculations for other Districts were not based on the method of applying each District's proportionate share of the fund balance to the allocable quarterly interest.

¹⁸ Deposition of Robert Healy at page 53.

¹⁹ Deposition of Robert Healy at pages 54-55.

²⁰ Deposition of Robert Healy at page 59.

²¹ Deposition of Robert Healy at pages 59-60.

²² Deposition of James Martin at page 67.

²³ Deposition of James Martin at page 70.

²⁴ Deposition of James Martin at page 116.

²⁵ Deposition of James Martin at page 66.

²⁶ Deposition of James Martin at page 69.

²⁷ Deposition of James Martin at page 132.

We noted the following:

- In his March 1995 investment interest calculation, Healy used a fund balance for District 107 that was \$333,333 greater than his underlying documentation indicated. By doing so, he increased District 107's proportion of the investment interest pool and, as such, over-allocated investment interest to that District.²⁸
- In his June 1997 calculation, Healy apparently under-allocated District 104 by \$55,264 and over-allocated District 109 by \$10,363 and LT by \$44,903.²⁹
- In his June 1998 investment interest calculation, Healy used a fund balance for District 106 that was \$323,003 greater than his underlying documentation indicated. By doing so, he increased District 106's proportion of the investment interest pool and, as such, over-allocated investment interest to that District.³⁰
- In his June 2005 calculation, Healy apparently over-allocated District 108 by \$3,612 and under-allocated District 106.5 by \$72,349. Healy's handwritten sheet actually allocated \$2,468,400, not the \$2,400,000 that is written on the sheet.³¹
- In his June 2006 calculation, Healy apparently over-allocated \$128,819 to LT. While his math on the handwritten sheet does not appear to be accurate for several Districts, the amount written on the sheet for LT agrees to the amount recorded in the TTO's general ledger.³²
- In Healy's June 2006 calculation, Districts 102, 107, and 109 appear to be over-allocated by \$20,000, \$16,108, and \$50,000, respectively. Districts 101, 106, 217, 999, 106.5, and 204.5 appear to be under-allocated by \$17,001, \$29,385, \$111,882, \$2,852, \$2,835, and \$3,552, respectively.³³
- In his April 2008 calculation, Healy apparently over-allocated \$27,863 to LT; however, the amount on Healy's handwritten sheet (\$292,000) for LT's quarterly distribution agrees to the amount recorded in the TTO's general ledger.³⁴
- In Healy's April 2008 calculation, District 999 was apparently over-allocated investment interest by \$8,685, and District 109 has an annotation on Healy's handwritten sheet that allocates an additional \$32,080.³⁵
- In his June 2009 calculation, Healy apparently over-allocated \$246,711 to LT; however the amount on the Healy's handwritten sheet (\$633,364) for LT's quarterly distribution agrees to the amount recorded in the TTO's general ledger.³⁶
- In Healy's June 2009 calculation, District 109 was apparently over-allocated investment interest by \$45,202 and District 999 by \$8,926.³⁷

²⁸ Exhibit E.

²⁹ Exhibit F.

³⁰ Exhibit G.

³¹ Exhibit H.

³² Exhibit I.

³³ Ibid.

³⁴ Exhibit J.

³⁵ Ibid.

³⁶ Exhibit K.

³⁷ Ibid.

- In his June 2012 calculation, Healy apparently under-allocated \$15,001 to LT; however, the amount written on Healy's handwritten sheet (\$336,977) for LT's quarterly distribution agrees to the amount recorded in the TTO's general ledger.³⁸
- In Healy's June 2012 calculation, District 204.5 was apparently under-allocated investment interest by \$20,001 and District 999 by \$9,993.³⁹

As demonstrated by the examples noted above, Healy did not always make clear and uniform calculations of interest that followed a proportionate allocation to the Districts. As such, Martin's reliance on Healy's calculation causes his analysis to be flawed.

- Martin did not use a consistent approach to general ledger entries to determine the amount of investment interest allocated to LT.

Martin testified "my analysis is based on the review of the general ledger records, which show the four entries for interest, one quarterly entry for the interest four times a year."⁴⁰ However, we noted entries for adjustments to interest that were made to the LT general ledger. Martin did not recall if he had seen any of those entries.⁴¹ He also did not use a consistent method when considering entries for interest amounts described in the general ledger as something other than quarterly interest.

The following are adjustments that Martin should have considered:

- At April 30, 1995, Martin alleges that LT was over-allocated investment interest by \$5,000.33. The TTO's general ledger shows an "INT TRANSF" of \$5,000.00 on that same date. Although Martin testified that he did not include that transfer,⁴² in order to arrive at his "Allocation per TTO GL," it must be included.
- At April 30, 1998, Martin alleges that LT was over-allocated investment interest by \$4,674.68. The TTO's general ledger shows an entry at March 31, 1998 for \$4,675.00 described as "QTRLY INT (10, 11, 12-1997)". Although Martin testified that he did not include that entry,⁴³ in order to arrive at his "Allocation per TTO GL," it must be included.
- Martin alleges that LT was under-allocated investment interest by \$101,829.90 at December 31, 1997. The TTO's independent auditor proposed an adjustment to the investment interest allocation. This adjustment was included by Healy in his handwritten calculation.⁴⁴ As such, this made Healy's calculation equal the amount recorded in the TTO's general ledger. Martin ignored this adjustment.

³⁸ Exhibit L.

³⁹ Ibid.

⁴⁰ Deposition of James Martin at page 132.

⁴¹ Deposition of James Martin at page 99.

⁴² Deposition of James Martin at page 135.

⁴³ Deposition of James Martin at page 141.

⁴⁴ Exhibit M.

- Martin determined that in adopting Bradshaw's analysis, there were certain numbers that he disagreed with and subsequently adjusted. One such adjustment was at June 30, 2006, where Martin found that Bradshaw interpreted a journal entry differently than he did.⁴⁵ Martin included an additional amount of \$31,500 as allocable investment interest for LT even though the TTO's general ledger entries described it as either "Interest" or "Trans Interest Retro on BD Res". Martin could not explain why he picked these entries, given their descriptions, after he testified earlier that he only picked up entries denoted as quarterly interest. When questioned why he determined the entry to be quarterly interest, he testified, "I don't know. At the time that's what I determined that to be."⁴⁶

Martin did not attempt to understand the purpose behind the entries by either talking to the professionals actually involved in the TTO's affairs (Healy, Sudd, or Baker Tilly) or searching for documents which would provide corroborating evidence of the transactions. The above mentioned general ledger entries contain descriptions that are vague, subject to translation, and appear to lack supporting documentation. We would have expected the TTO to provide supporting documentation for journal entries that are recorded in its general ledger. The general ledger contains entries that have not been adequately explained by the TTO or Martin, which raises questions as to Martin's analysis.

- Martin does not remember seeing annotations of apparent additional investment interest allocations made on Healy's handwritten sheets, even though he reviewed and relied upon them.⁴⁷

In certain quarters, Healy's sheets contained handwritten notes and/or annotations which appear to adjust the calculated amounts. Martin testified that he's "not familiar with those notes you're describing . . ."⁴⁸ Martin further testified that it was his practice to ignore adjustments and utilize the straight calculation of quarterly interest that Healy performed.⁴⁹

Our analysis of Healy's handwritten sheets shows numerous annotations, which appear to show a relation between the handwritten note and the amount recorded in the TTO's general ledger. For example:

- In his December 1997 calculation, Healy applied suggested adjustments from the TTO's independent auditor, which in effect reduced allocated investment interest to District 109 by \$6,098 and LT by \$101,830, and increased allocated investment interest to all other Districts.⁵⁰
- At April 2007, Healy's handwritten sheet includes a note for an additional \$125,000 for LT. When added to the initial investment interest allocation on the sheet, the total equals the amount recorded in the TTO's general ledger.⁵¹

⁴⁵ Deposition of James Martin at page 163.

⁴⁶ Deposition of James Martin at page 166.

⁴⁷ Deposition of James Martin at page 70.

⁴⁸ Deposition of James Martin at page 71.

⁴⁹ Deposition of James Martin at page 151.

⁵⁰ Exhibit M.

⁵¹ Exhibit N.

- At January 2007, Healy's handwritten sheet includes a note for an additional \$125,000 for LT. When added to the initial investment interest allocation on the sheet, the total equals the amount recorded in the TTO's general ledger.⁵²
- At October 2006, Healy's handwritten sheet includes a note for an additional \$125,000 for LT. When added to the initial investment interest allocation on the sheet, the total equals the amount recorded in the TTO's general ledger. Healy also notes at the bottom of the page "#204 will be adjusted @ EOY for larger est. payout."⁵³
- At April 2008, Healy's handwritten notes include an additional \$32,080 for District 109.⁵⁴
- At November 2007, Healy's handwritten sheet includes a note for an additional \$100,000 for LT. When added to the initial interest allocation, the total equals the amount recorded in the TTO's general ledger.⁵⁵
- At June 2009, Healy's handwritten sheets include a note for an additional \$45,203 for District 109.⁵⁶ When added to the initial interest allocation, the total equals the amount recorded in the TTO's general ledger.
- At June 2011, Healy's handwritten sheet includes a reduction of \$200,000 from LT's allocation. Martin's calculation shows that LT was under-allocated by that amount. The amount listed on Healy's handwritten sheet equals the amount recorded in the TTO's general ledger.⁵⁷

We do not have sufficient information to explain how or why Healy deviated from exact proportional allocations. By simply ignoring these deviations, when noted, Martin's analysis is inconsistent with the facts that are known in this matter and, as such, is unreasonable.

- Other Districts also may have been over-allocated and under-allocated investment interest under the TTO's methodology.

The TTO's amended complaint, in accusing LT of receiving over-allocations of investment interest, further states that, as a result, the other Districts have been under-allocated interest.⁵⁸ Dr. Birkenmaier testified that, to the best of her knowledge, no District, other than LT, received an over-allocation during the Relevant Period.⁵⁹ Healy testified that he did not recall paying LT or any other District more than they were entitled to.⁶⁰ However, Healy testified that if there were over-allocations in one year, he would make it up by reducing future allocations.⁶¹

⁵² Exhibit O.

⁵³ Exhibit P.

⁵⁴ Exhibit J.

⁵⁵ Exhibit Q.

⁵⁶ Exhibit K.

⁵⁷ Exhibit R.

⁵⁸ TTO Amended Complaint paragraph 46.

⁵⁹ Deposition of Dr. Susan Birkenmaier at page 234.

⁶⁰ Deposition of Robert Healy at page 64.

⁶¹ Ibid.

Martin began an analysis to understand what had occurred with Districts other than LT. Martin looked at interest allocations for 11 quarters for most of the Districts and 28 quarters for the others.⁶² Martin testified "the purpose of this analysis was to show that the other districts weren't also getting interest out -- weren't getting additional interest at the time that 204 was."⁶³ However, he found the opposite; other Districts received additional allocations based on his methodology.

Martin's analysis of the other Districts discovered anomalies in quarterly interest payments that, had they been made to LT, he would have concluded to be over-allocations. Martin tested 11 quarters for District 109, noting that in 4 of those quarters, the TTO paid additional interest amounts to District 109. When he found what he considered to be additional interest payments to LT, he concluded they were over-allocations. (An example is the general ledger entry for \$31,500 for LT that Martin concluded was a quarterly interest payment.) However, Martin testified that he could not characterize the additional interest payments to District 109 as over-allocations without further analysis and consultation with the TTO.⁶⁴ Martin testified that there was no one he could speak with at the TTO who had knowledge of the payments to District 109.⁶⁵

Martin testified that if a District other than LT was allocated disproportionately, then they would theoretically need to be adjusted.⁶⁶ But in those periods where he identified a misallocation to LT, he believed that the other Districts received exactly the percentage that was detailed on Healy's notes.⁶⁷

We also examined this issue. Our testing (for the period covering Martin's analysis) disclosed that Districts other than LT were also allocated investment interest amounts other than what was calculated on Healy's handwritten sheets. We observed over- and under-allocations of investment interest to numerous Districts other than LT, as noted in our discussion regarding the mathematical accuracy of Healy's calculations above.

As demonstrated above, it is clear that Districts other than LT were also receiving under and over allocations when examined using the TTO's methodology. As with LT, Healy's calculations of interest payments and the general ledger entries for other Districts cannot be fully explained by the available documentation and witness testimony. In addition, the TTO's position that over-allocations to LT necessarily resulted in corresponding under-allocations to all other Districts is erroneous.

⁶² Deposition of James Martin at page 77.

⁶³ Deposition of James Martin at page 76.

⁶⁴ Deposition of James Martin at pages 75-81.

⁶⁵ Deposition of James Martin at page 79.

⁶⁶ Deposition of James Martin at pages 154-155.

⁶⁷ Ibid.

- The TTO made a \$1.5 million reduction to LT's allocable investment interest.

During June 2011, the TTO recorded an adjustment to the LT general ledger that effectively reduced allocable investment interest by approximately \$1.5 million.⁶⁸ The journal entry decreases LT's cash and beginning fund balance accounts with a description of "J/E Audit Adjustment Interest." However, neither Martin nor any representative of the TTO has been able to explain why LT's interest allocation was reduced by \$1.5 million.

Martin attempted to perform a twelve-year analysis of interest allocations related to LT. Martin testified that he is not familiar with this "audit adjustment" transaction⁶⁹ and that this entry was unimportant to his analysis and had no effect.⁷⁰

Representatives of the TTO were either not aware of, or made no effort to understand, this adjustment. Theissen testified that he was not familiar with the \$1.5 million adjustment.⁷¹ Theissen speculated that the \$1,512,451 adjustment could be an off-set for a July 2010 entry for expenses in the amount of \$1,587,296.⁷² It is highly unlikely that these two general ledger entries are related, particularly because they are both reductions to cash. We have seen no entry in the general ledger that we believe constitutes an off-set to the \$1,512,451 adjustment.

Dr. Birkenmaier testified that she made no effort to look at the records of the TTO to determine why LT's funds were being adjusted by \$1.5 million.⁷³ Dr. Birkenmaier did not talk to anyone at the TTO in order to understand the transaction.⁷⁴

This entry reduced LT's allocated investment interest by \$1.5 million. This amount exceeds the total over-allocations alleged by the TTO. It is apparent that Martin's review of the general ledgers LT maintained at the TTO was incomplete because he did not locate and include this journal entry in his analysis. We also do not understand why the TTO is unable to explain a transaction of this magnitude, and does not appear to have any documentation to support this reduction in LT's fund balance.

⁶⁸ Exhibit S.

⁶⁹ Deposition of James Martin at page 50.

⁷⁰ Deposition of James Martin at pages 59-60.

⁷¹ Deposition of Michael Theissen at pages 78-79.

⁷² Deposition of Michael Theissen at pages 80-81.

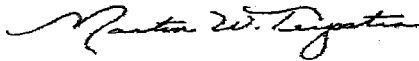
⁷³ Deposition of Dr. Susan Birkenmaier at page 188.

⁷⁴ Deposition of Dr. Susan Birkenmaier at page 192.

E. Documents Reviewed

- All TTO document productions in this case
- All LT document productions in this case
- James Martin's disclosures, exhibits, and invoices
- Deposition transcript of Michael Theissen
- Deposition transcript of Dr. Susan Birkenmaier
- Deposition transcript of James P. Martin
- Deposition transcript of Kelly Bradshaw
- Deposition transcript of Robert Healy
- Verified Amended Complaint for Declaratory Relief
- Portions of the Illinois School Code relating to the TTO operations
- Township Trustee's Response to District 204's Revised Motion to Compel Production of Documents
- Lyons' Revised Motion to Compel Production of Documents
- Defendant's Verified Answer and Affirmative Defenses to Amended Complaint for Declaratory Relief

Respectfully submitted,



Martin W. Terpstra, CPA, CFE

Exhibit A

{Martin W. Terpstra, CPA, CFE}

forensic & valuation services

partner



EXPERIENCE

Martin Terpstra is a Partner in the Forensic and Valuation Services Group of Plante Moran. He is a certified public accountant and a certified fraud examiner with over 40 years of experience as an auditor, consultant and fraud examiner covering many diverse industries.

Marty is a frequent speaker for professional organizations and serves as an adjunct faculty member at Benedictine University teaching courses in forensic accounting and auditing. He has developed risk management programs for accounting firms, which he presents nationally to such firms and professional organizations. He has also developed training programs for insurance claims specialists and fraud detection and prevention programs.

Experience includes:

- Served as neutral accountant in contract disputes and post-acquisition disputes.
- Directed more than 200 forensic investigations involving misstatement of financial statements and misappropriation of corporate assets.
- Directed special investigations for the boards of directors of publicly-traded companies, including representation before the Securities and Exchange Commission.
- Directed investigation of financial improprieties at a "Fortune 100" company. The magnitude of such financial overstatements exceeded \$100 million.
- Testified as an expert witness in depositions, trials and alternative dispute resolution.
- Prepared expert damage analyses and rebutted opposing experts in complex matters.
- Investigated more than 800 accountants' professional liability claims involving the application and interpretation of accounting principles and auditing standards.
- Consulted in several class action securities fraud cases.
- Directed merger and acquisition due diligence engagements.
- Directed royalty audits for franchisors and publishers.
- Experienced in governmental and not-for-profit accounting and auditing.
- Investigated claims involving construction contractors and government contractors.
- Investigated embezzlements from family offices and family trusts.

Exhibit A

- Investigated failed insurance companies involving off-shore fraud and money-laundering schemes.
- Investigated fraud involving real estate entities and title companies.
- Investigated failures of financial institutions, including loan portfolio analysis.

EDUCATION

- DePaul University, BS, Accounting (Magna Cum Laude)
- DePaul University, Master of Accountancy (With Distinction)

PROFESSIONAL

- American Institute of Certified Public Accountants
- Illinois CPA Society
- Association of Certified Fraud Examiners
- Government Finance Officers Association
- Professional Liability Underwriting Society

CONTACT INFORMATION

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Exhibit B

Lyons Township Matter Analysis of Audited Financial Statements Net Earnings on Investments

<u>Fiscal Year</u>	<u>Interest Earned</u>	<u>Interest Paid</u>	<u>Net Earnings On Investments</u>	<u>Running Balance</u>
6/30/1995	\$ 855,499		\$ 855,499	\$ 855,499
6/30/1996	(314,414)		(314,414)	541,085
6/30/1997	(434,822) (A)		(434,822)	106,263
6/30/1998	(127,536) (A)		(127,536)	(21,273)
6/30/1999	260,497 (A)		260,497	239,224
6/30/2000	222,521 (A)		222,521	461,745
6/30/2001	(904,957) (A)		(904,957)	(443,212)
6/30/2002	(1,946,645) (A)		(1,946,645)	(2,389,857)
6/30/2003	3,256,195 (A)		3,256,195	866,338
6/30/2004	3,726,085	\$ 6,003,344	(2,277,259)	(1,410,921)
6/30/2005	5,320,575	4,941,917	378,658	(1,032,263)
6/30/2006	5,669,761	4,558,514	1,111,247	78,984
6/30/2007	8,962,383	7,928,394	1,033,989	1,112,973

Note:

(A) - Interest on Investments - net of distributions to school districts

Exhibit C

**LYONS TOWNSHIP SCHOOL TREASURER
TOWNSHIP 38 NORTH, RANGE 12 EAST**

FINANCIAL STATEMENTS

**FOR THE YEAR ENDED JUNE 30, 2002
AND
INDEPENDENT AUDITORS' REPORT**

LYONS TOWNSHIP SCHOOL TREASURER

TABLE OF CONTENTS

JUNE 30, 2002

EXHIBIT

PAGE

Independent Auditors' Report	1
------------------------------------	---

COMBINED FINANCIAL STATEMENTS

All Fund Types

A	Combined Statement of Assets and Liabilities Arising from Cash Transactions	3
B	Combined Statement of Cash Receipts, Expenditures and Changes in Fund Balances	4
	Notes to Financial Statements	5

REQUIRED SUPPLEMENTARY INFORMATION (UNAUDITED)

Illinois Municipal Retirement Fund Analysis of Funding Progress	9
--	---

COMBINING FINANCIAL STATEMENTS

General Fund

C-1	Combining Statement of Assets and Liabilities Arising from Cash Transactions	10
C-2	Combining Statement of Cash Receipts, Expenditures and Changes in Fund Balances	11

Special Revenue Funds

D-1	Combining Statement of Assets and Liabilities Arising from Cash Transactions	12
D-2	Combining Statements of Cash Receipts, Expenditures and Changes in Fund Balances	13

SCHEDULE

SUPPLEMENTARY SCHEDULE

1	Combined Balance Sheets	14
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Gurrie

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INDEPENDENT AUDITORS' REPORT

December 14, 2002

To the Board of Trustees
Lyons Township School Treasurer
Township 38 North, Range-12 East
930 Barnsdale Road
LaGrange Park, Illinois 60525

We have audited the accompanying combined financial statements of Lyons Township School Treasurer as of and for the year ended June 30, 2002, as listed in the table of contents. These combined financial statements are the responsibility of Lyons Township School Treasurer's management. Our responsibility is to express an opinion on these combined financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the combined financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the combined financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall combined financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

The Lyons Township School Treasurer does not maintain detailed records of the historical cost of its fixed assets, primarily office furniture and equipment. The statement of general fixed assets required by generally accepted accounting principles is not included in the accompanying financial statements.

As described in Note 1, Lyons Township School Treasurer prepares its financial statements on the cash basis, which is a comprehensive basis of accounting other than generally accepted accounting principles.

In our opinion, except that the omission of data described above results in an incomplete presentation as explained in the second paragraph, the financial statements referred to above present fairly, in all material respects, the assets, liabilities and fund balances arising from cash transactions of Lyons Township School Treasurer as of June 30, 2002, and the receipts, expenditures and changes in fund balances for the year then ended on the basis of accounting described in Note 1.

Our audit was conducted for the purpose of forming an opinion on the combined financial statements taken as a whole. The combining and individual fund financial statements and schedules listed in the table of contents are presented for purposes of additional analysis and are not a required part of the combined financial statements of Lyons Township School Treasurer. Such information has been subjected to the auditing procedures applied in the audit of the combined financial statements and, in our opinion, is fairly presented in all material respects in relation to the combined financial statements taken as a whole.

The historical pension information listed in the table of contents is not a required part of the combined financial statements but is supplementary information required by the Government Accounting Standards Board. We have applied certain limited procedures, which consisted principally of inquiries of management regarding the methods of measurement and presentation of the supplementary information. However, we did not audit the information and express no opinion on it.

William F. Gurrie & Co., Inc.
WILLIAM F. GURRIE & CO., LTD.

LYONS TOWNSHIP SCHOOL TREASURER
ALL FUND TYPES
COMBINED STATEMENT OF ASSETS AND LIABILITIES
ARISING FROM CASH TRANSACTIONS
JUNE 30, 2002

	GENERAL FUND	SPECIAL REVENUE FUNDS	FIDUCIARY <u>FUND TYPE</u> AGENCY FUND	TOTAL (MEMORANDUM ONLY)
<u>ASSETS</u>				
Cash	\$ (3,524,267)	\$ 74,196	\$ -	\$ (3,450,071)
Investments maintained for participating school districts	-	-	146,924,360	146,924,360
Total Assets	\$ (3,524,267)	\$ 74,196	\$ 146,924,360	\$ 143,474,289
<u>LIABILITIES AND FUND BALANCE</u>				
<u>Liabilities</u>				
Due to participating school districts	\$ -	\$ -	\$ 146,924,360	\$ 146,924,360
<u>Fund Balance</u>				
Fund Balance (deficit)	(3,524,267)	74,196	-	(3,450,071)
Total Liabilities and Fund Balance	\$ (3,524,267)	\$ 74,196	\$ 146,924,360	\$ 143,474,289

See Notes to Financial Statements

LYONS TOWNSHIP SCHOOL TREASURER
ALL FUND TYPES
COMBINED STATEMENT OF CASH RECEIPTS, EXPENDITURES
AND CHANGES IN FUND BALANCE
FOR THE YEAR ENDED JUNE 30, 2002

	GENERAL FUND	SPECIAL REVENUE FUNDS	TOTAL (MEMORANDUM ONLY)
<u>RECEIPTS</u>			
Contributions from Participating Districts	\$ 632,557	\$ 5,648,974	\$ 6,281,531
Interest on Investments - net of distributions to school districts	(1,946,645)	22,720	(1,923,925)
Other	<u>8,756</u>	<u>-</u>	<u>8,756</u>
Total Receipts	<u>(1,305,332)</u>	<u>5,671,694</u>	<u>4,366,362</u>
<u>EXPENDITURES</u>			
Insurance and Related Costs	-	5,901,612	5,901,612
Operating Expenditures	<u>847,586</u>	<u>-</u>	<u>847,586</u>
Total Expenditures	<u>847,586</u>	<u>5,901,612</u>	<u>6,749,198</u>
EXCESS (DEFICIENCY) OF RECEIPTS OVER EXPENDITURES	(2,152,918)	(229,918)	(2,382,836)
FUND BALANCE, BEGINNING OF YEAR	<u>(1,371,349)</u>	<u>304,114</u>	<u>(1,067,235)</u>
FUND BALANCE, END OF YEAR	<u>\$ (3,524,267)</u>	<u>\$ 74,196</u>	<u>\$ (3,450,071)</u>

See Notes to Financial Statements

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2002

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accounting policies of the Lyons Township School Treasurer (the "Treasurer") conform to the cash basis of accounting as defined by the Illinois State Board of Education Audit Guide. The following is a summary of the more significant accounting policies of the District:

A. Reporting Entity

In evaluating how to define the Treasurer for financial reporting purposes, management has considered all potential component units. The decision to include a potential component unit in the reporting entity was made by applying the criteria set forth in Generally Accepted Accounting Principles. The definition of a component unit is an organization for which the Treasurer is financially accountable and other organizations for which the nature and significance of their relationship with the Treasurer are such that exclusion would cause the reporting entity's financial statements to be misleading or incomplete. The Treasurer is financially accountable if it appoints a voting majority of the organization's governing body and (1) it is able to impose its will on that organization or (2) there is a potential for the organization to provide specific financial benefits to, or impose specific financial burdens on, the Treasurer. The Treasurer also may be financially accountable if an organization is fiscally dependent on the Treasurer regardless of whether the organization has (1) a separately elected governing board, (2) a governing board appointed by a higher level of government or (3) a jointly appointed board. Even though there are local government agencies within the geographic area served by the Treasurer, such as the various villages, schools, libraries and park districts, the agencies have been excluded from the report because they are legally separate and the Treasurer is not financially accountable for them.

B. Basis of Accounting

The Treasurer's financial records are maintained on the cash basis of accounting and, accordingly, revenues are recorded when cash is received and expenditures are recorded when cash is disbursed. Only assets representing a right to receive cash from a previous payment of cash are recorded as assets of a fund. In the same manner, only liabilities resulting from a previous cash transaction are recorded as liabilities of a particular fund.

C. Basis of Presentation-Fund Accounting

The accounts of the Treasurer are organized on the basis of funds, each of which is considered a separate accounting entity. The operations of each fund are accounted for with a separate set of self-balancing accounts that comprise its assets and liabilities (arising from cash transactions), fund balances, revenue received and expenditures disbursed. The Treasurer maintains individual funds required by the State of Illinois. Resources are allocated to and accounted for in individual funds based upon the purposes for which they are to be spent and the means by which spending activities are controlled. The following fund type is used by the Treasurer.

Governmental Fund Type

Governmental Funds are those through which all governmental functions of the Treasurer are financed. The acquisition, use and balances of the Treasurer's expendable financial resources and the related liabilities (arising from cash transactions) are accounted for through governmental funds.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2002

The General Fund, which consists of the Distributive Fund, is the general operating fund of the Treasurer. It is used to account for all financial resources except those required to be accounted for in another fund.

Special Revenue Funds, which include both the Medical Self-Insurance Fund and the Dental Self-Insurance Fund, are used to account for cash received from specific sources that are legally restricted to cash disbursements for specified purposes.

D. Investments

State statutes authorize the District to invest in obligations of the U.S. Treasury, certain highly-rated commercial paper, corporate bonds, repurchase agreements, and the State Treasurer's Investment Pool. Investments are carried at cost, which approximates market value.

2. CASH AND INVESTMENTS

Under Illinois Compiled Statutes, the Lyons Township School Treasurer is the lawful custodian of all school funds. The Treasurer is appointed by the Township School Trustees, an independent elected body, to serve the school districts in the township. The Treasurer is the direct recipient of property taxes, replacement taxes and most state and federal aid and disburses school funds upon lawful order of the school board. The Treasurer invests excess funds at his discretion, subject to the legal restrictions discussed below. For these purposes, the Treasurer is permitted to combine monies from more than one fund of a single district and to combine monies of more than one district in the township. Monies combined under these circumstances as well as investment earnings are accounted for separately for each fund and/or district.

The Treasurer's investment policies are established by the Township School Trustees as prescribed by the Illinois School Code and the Illinois Compiled Statutes. The Treasurer is authorized to invest in obligations of the U.S. Treasury, backed by the full faith and credit of the U.S. Government, certificates of deposit issued by commercial banks and savings and loan associations, and commercial paper rated within the three highest classifications by at least two standard rating services (subject to certain limitations).

At year-end, the District's cash and investments totaled \$146,924,360. For disclosure purposes, this amount is segregated into three components: 1) cash on hand; 2) deposits with financial institutions, which include amounts held in demand accounts, savings accounts and non-negotiable certificates of deposit; and 3) investments, which consist of all investments other than certificates of deposit. The carrying amount of cash on hand, deposits with financial institutions, and investments at year-end was \$200, \$20,236,546 and \$126,687,614, respectively.

At year-end, the bank balance of the District's deposits with financial institutions was \$28,191,137. Of this balance, \$13,272,748 was covered by federal depository insurance or collateralized with securities held by the District or its agent in the District's name. The remaining balance of \$14,918,389 was uncollateralized, or collateralized with securities held by the pledging financial institution or its trust department or agent, but not in the District's name.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2002

Investments are categorized into these three categories of credit risk:

1. Insured or registered, or securities held by the Treasurer or its agent in the Treasurer's name.
2. Uninsured and unregistered, with securities held by the counter-party's trust department or agent in the Treasurer's name.
3. Uninsured and unregistered, with securities held by the counter-party, or by its trust department or agent but not in the Treasurer's name.

At June 30, 2002, the Treasurer held the following investments for the school districts in the Township:

	<u>Category 2</u>	<u>Carrying Amount</u>	<u>Market Value</u>
U.S. Government Securities	\$ 63,957,545	\$ 63,957,545	\$ 64,168,036
Money Market Funds	1,650,378	1,650,378	1,650,378
Corporate Bonds	251,600	251,600	435,146
Commercial Paper	5,892,408	5,892,408	5,900,535
Mutual Funds	<u>54,935,329</u>	<u>54,935,329</u>	<u>54,935,329</u>
Total	<u>\$ 126,687,260</u>	126,687,260	127,089,424
Illinois Funds		<u>354</u>	<u>354</u>
Total Investments		<u>\$ 126,687,614</u>	<u>\$ 127,089,778</u>

Illinois Funds is an investment pool managed by the State of Illinois, Office of the Treasurer, which allows governments within the State to pool their funds for investment purposes. Illinois Funds is not registered with the SEC as an investment company, but does operate in a manner consistent with Rule 2a7 of the Investment Company Act of 1940. Investments in Illinois Funds are valued at Illinois Funds' share price, which is the price the investment could be sold for.

3. RETIREMENT FUND COMMITMENTS

The Treasurer's defined benefit pension plan, Illinois Municipal Retirement (IMRF), provides retirement, disability, annual cost of living adjustments and death benefits to plan members and beneficiaries. IMRF acts as a common investment and administrative agent for local governments and school districts in Illinois. The Illinois Pension Code establishes the benefit provisions of the plan that can only be amended by the Illinois General Assembly. IMRF issues a publicly available financial report that includes financial statements and required supplementary information. That report may be obtained by writing to the Illinois Municipal Retirement Fund, 2211 York Road, Suite 500, Oak Brook Illinois 60523.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2002

Employees participating in IMRF are required to contribute 4.50 percent of their annual covered salary. The member rate is established by state statute. The Treasurer is required to contribute at an actuarially determined rate. The employer rate for calendar year 2001 was 10.20 percent of payroll. The employer contribution requirements are established and may be amended by the IMRF Board of Trustees. IMRF's unfounded actuarial accrued liability is being amortized as a level percentage of projected payroll on a closed basis. The remaining amortization period at December 31, 2001 was 31 years. For December 31, 2001, the Treasurer's annual pension cost of \$30,427 was equal to the Treasurer's required and actual contributions. The required contribution was determined as part of the December 31, 1999 actuarial valuation using the entry age actuarial cost method. The actuarial assumptions included (a) 7.50% investment rate of return (net of administrative expenses), (b) projected salary increases of 4.00% a year, attributable to inflation, (c) additional projected salary increases ranging from 0.4% to 11.6% per year depending on age and service, attributable to seniority/merit, and (d) post-retirement benefit increases of 3% annually. The actuarial value of IMRF assets was determined using techniques that smooth the effects of short-term volatility in the market value of investments over a five-year period. The assumptions used for the 2001 actuarial valuation were based on the 1996-1998 experience study.

4. COMPENSATED ABSENCES

An employee who has completed at least 60 workdays is entitled to be compensated for vacation time. Vacations are to be taken following the year in which they are earned. Unused vacation time may be taken as comparable time off or paid at the discretion of the Treasurer. Employees who resign or whose employment is terminated for any reason will be paid for unused vacation time.

Sick leave of 10 days per year is provided on a pro-rata basis to all employees. Unused sick leave can accumulate to 240 days.

5. RISK MANAGEMENT

The Treasurer is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; and natural disasters. The Treasurer purchases commercial insurance for these risks. There has been no significant reduction in coverage since last year.

6. RELATED PARTY TRANSACTION

In prior years, certain participating districts failed to pay all or part of their pro-rata share of Township expenditures. The amount owed to the Lyons Township School Treasurer's Office at June 30, 2002 is \$213,716 relating to billing periods through June 30, 2001. This amount is expected to be collected within a year. The billings for 2002 will occur in 2003.

7. PRONOUNCEMENT ISSUED BUT NOT YET ADOPTED

GASB Statement No. 34, *Basic Financial Statements and Management's Discussion and Analysis for State and Local Governments*, establishes financial reporting standards for state and local governments. Some of the more significant aspects of the new standard include: reporting the overall state of the government's financial health, not just individual funds; providing the most complete information available about the cost of delivering services to the citizens; including fixed asset accounting and depreciation; and including an introductory section analyzing the government's financial performance. The District is required to adopt this Statement for the fiscal year ending June 30, 2004. The adoption of this statement will have a material effect on the District's financial statements.

LYONS TOWNSHIP SCHOOL TREASURER

ILLINOIS MUNICIPAL RETIREMENT FUND ANALYSIS OF FUNDING PROGRESS (UNAUDITED) JUNE 30, 2002

Actuarial Valuation Date	Annual Pension Cost (APC)	Percentage of APC Contributed	Net Pension Obligation
12/31/01	\$ 30,427	100%	\$ -
12/31/00	29,074	100%	-
12/31/99	25,401	100%	-
12/31/98	26,443	100%	-
12/31/97	28,134	100%	-
12/31/96	27,586	100%	-

Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial Accrued Liability (AAL) Entry Age (b)	Unfunded AAL (UAAL) (b-a)	Funded Ratio (a/b)	Covered Payroll (c)	UAAL as a Percentage of Covered Payroll ((b-a)/c)
12/31/01	\$ 410,594	\$ 634,461	\$ 223,867	64.72%	\$ 298,309	75.05%
12/31/00	712,436	753,591	41,155	94.54%	260,517	15.80%
12/31/99	590,235	674,109	83,874	87.56%	220,693	38.00%
12/31/98	452,816	583,432	130,616	77.61%	200,329	65.20%
12/31/97	380,210	525,989	145,779	72.28%	212,814	68.50%
12/31/96	288,889	481,060	192,171	60.05%	193,177	99.48%

*Digest of Changes

Assumptions

The actuarial assumptions used to determine the actuarial accrued liability for 2000 were changed due to the 1996-1998 Experience Study.

The principal changes were:

- More members are expected to take refunds early their career.
- For both Regular and SLEP members, more normal and early retirements are expected to occur.
- Expected salary increases due to longevity for employees with less than 6 years of service were increased.

LYONS TOWNSHIP SCHOOL TREASURER
GENERAL FUND
COMBINING STATEMENT OF ASSETS AND LIABILITIES
ARISING FROM CASH TRANSACTIONS
JUNE 30, 2002

**TOTAL
GENERAL**

ASSETS

Cash and investments

\$ (3,524,267)

Total Assets

\$ (3,524,267)

FUND BALANCE

Fund Balance (deficit)

\$ (3,524,267)

Total Fund Balance

\$ (3,524,267)

LYONS TOWNSHIP SCHOOL TREASURER
GENERAL FUND
COMBINING STATEMENT OF CASH RECEIPTS, EXPENDITURES
AND CHANGES IN FUND BALANCES
FOR THE YEAR ENDED JUNE 30, 2002

	TOTAL GENERAL
<hr/>	
<u>RECEIPTS</u>	
Contributions from districts	\$ 632,557
Interest on Investments - net of distributions to school districts	(1,946,645)
Other	<u>8,756</u>
Total Receipts	<u>(1,305,332)</u>
 <u>EXPENDITURES</u>	
Salaries	352,467
Benefits	82,306
Professional Services	163,374
Maintenance Services	14,663
Equipment Rental and Maintenance	24,749
Rent	26,912
Property Appraisal	1,360
Auto Expense	6,600
Publications and Financial Report	21,248
Supplies and Materials	80,807
Utilities	60,386
Dues and Subscriptions	3,628
Property Insurance	4,029
Other	<u>5,057</u>
Total Expenditures	<u>847,586</u>
<hr/>	
EXCESS (DEFICIENCY) OF RECEIPTS OVER EXPENDITURES	(2,152,918)
FUND BALANCE (DEFICIT), BEGINNING OF YEAR	<u>(1,371,349)</u>
FUND BALANCE (DEFICIT), END OF YEAR	<u>\$ (3,524,267)</u>

LYONS TOWNSHIP SCHOOL TREASURER
SPECIAL REVENUE FUNDS
COMBINING STATEMENT OF ASSETS AND LIABILITIES
ARISING FROM CASH TRANSACTIONS
JUNE 30, 2002

	MEDICAL SELF INSURANCE	DENTAL SELF INSURANCE	TOTAL SPECIAL REVENUE
<u>ASSETS</u>			
Cash and Investments	\$ (83,050)	\$ 157,246	\$ 74,196
Total Assets	\$ (83,050)	\$ 157,246	\$ 74,196
<u>FUND BALANCE</u>			
Fund Balance (Deficit)	(83,050)	157,246	74,196
Total Fund Balance (Deficit)	\$ (83,050)	\$ 157,246	\$ 74,196

LYONS TOWNSHIP SCHOOL TREASURER
SPECIAL REVENUE FUNDS
COMBINING STATEMENT OF CASH RECEIPTS, EXPENDITURES
AND CHANGES IN FUND BALANCES
FOR THE YEAR ENDED JUNE 30, 2002

	MEDICAL SELF INSURANCE	DENTAL SELF INSURANCE	TOTAL SPECIAL REVENUE
<u>RECEIPTS</u>			
Contributions from Participating Districts	\$ 5,393,228	\$ 255,746	\$ 5,648,974
Net Interest on Investments	<u>13,237</u>	<u>9,483</u>	<u>22,720</u>
 Total Receipts	 <u>5,406,465</u>	 <u>265,229</u>	 <u>5,671,694</u>
<u>EXPENDITURES</u>			
Claims by Employees	4,004,312	232,227	4,236,539
Co-Insurance Costs	373,183	-	373,183
Consulting Costs	69,822	-	69,822
Administrative Costs	278,455	-	278,455
Alternative Insurance Costs	618,485	-	618,485
Program Costs	302,835	-	302,835
Other	<u>21,365</u>	<u>928</u>	<u>22,293</u>
 Total Expenditures	 <u>5,668,457</u>	 <u>233,155</u>	 <u>5,901,612</u>
 EXCESS OF RECEIPTS OVER EXPENDITURES	 (261,992)	 32,074	 (229,918)
 FUND BALANCE, BEGINNING OF YEAR	 <u>178,942</u>	 <u>125,172</u>	 <u>304,114</u>
 FUND BALANCE (DEFICIT), END OF YEAR	 <u>\$ (83,050)</u>	 <u>\$ 157,246</u>	 <u>\$ 74,196</u>

LYONS TOWNSHIP SCHOOL TREASURER

COMBINED BALANCE SHEETS JUNE 30, 2002

	Total	#69	#101	#102	#103	#104	#105	#106
<u>CASH AND INVESTMENTS</u>								
Cash and Investments held by Treasurer	\$ 148,205,213	\$ 4,144,969	\$ 7,250,671	\$ 30,428,552	\$ 2,052,183	\$ 6,588,071	\$ 6,642,682	\$ 13,033,884
Cash and Investments held by District	1,716,603	19,979	77,958	117,380	50,829	37,491	9,857	76,876
Receivables (net of allowance for uncollectibles)								
Property taxes	80,123,739	1,750,342	3,576,658	10,055,517	5,669,634	6,067,650	5,560,584	4,980,619
Replacement taxes	1,033,385	16,254	138,511	-	198,739	74,928	108,633	5,965
Intergovernmental	3,374,424	37,287	88,947	303,146	295,326	178,352	62,388	50,307
Other Current Assets	1,906,276	4,899	-	294,807	7,257	297,515	-	-
Due from Administrative Agent	127,683	-	-	-	-	-	-	-
Total Assets	\$ 238,487,323	\$ 5,973,730	\$ 11,132,745	\$ 41,199,402	\$ 8,273,968	\$ 13,244,007	\$ 12,384,154	\$ 18,147,651
<u>LIABILITIES AND FUND BALANCE</u>								
Liabilities:								
Payroll Deductions Payable	\$ 82,940	\$ 3,410	\$ 610	\$ 10,361	\$ 24,559	\$ 13,648	\$ 3,459	\$ 5,091
Due to Activity Fund Organizations	1,586,561	14,979	72,958	107,339	42,829	27,491	3,867	69,376
Accounts Payable	6,669,693	75,068	290,224	1,827,609	105,261	582,509	320,475	133,216
Salaries and Wages Payable	1,352,041	42,005	-	3,996	34,236	68,432	15,789	-
Compensated Absences	214,268	3,756	9,395	-	-	-	28,435	10,048
Deferred Revenue	80,724,282	1,669,612	3,643,381	10,055,517	5,717,008	6,309,478	5,560,584	4,980,619
Other Current Liabilities	2,227,005	-	68,532	-	-	984,142	-	-
Due to Joint Agreements	127,684	-	-	127,684	-	-	-	-
Total Liabilities	92,974,474	1,809,030	4,085,100	12,132,506	5,923,893	7,985,700	5,932,609	5,198,350
Fund Balance:								
Total Fund Balance	143,512,849	4,164,700	7,047,645	29,066,896	2,350,075	5,258,307	6,451,545	12,949,301
Total Liabilities and Fund Balance	\$ 236,467,323	\$ 5,973,730	\$ 11,132,745	\$ 41,199,402	\$ 8,273,968	\$ 13,244,007	\$ 12,384,154	\$ 18,147,651

Schedule 1

#107	#108	#109	#204	#217	HEADSTART	BASE	LADSE	TREASURER'S OFFICE
\$ 5,455,793	\$ 1,941,160	\$ 17,135,699	\$ 28,958,506	\$ 24,514,555	\$ -	\$ -	\$ 3,498,559	\$ (3,450,071)
18,921	23,349	60,351	977,243	242,859	-	-	3,500	-
3,846,082	1,035,601	5,703,838	21,319,768	10,557,446	-	-	-	-
45,594	5,880	50,159	296,419	92,303	-	-	-	-
100,468	231,223	391,630	312,127	258,072	-	-	1,065,151	-
22,931	1,862	-	801,835	190,513	-	-	284,657	-
-	-	-	-	-	10,798	116,885	-	-
\$ 9,499,789	\$ 3,239,075	\$ 23,341,677	\$ 52,665,898	\$ 35,855,748	\$ 10,798	\$ 116,885	\$ 4,851,867	\$ (3,450,071)
\$ 16,014	\$ 2,836	\$ -	\$ 1,531	\$ (16,325)	\$ -	\$ -	\$ 19,748	\$ -
15,921	21,349	60,351	957,243	192,858	-	-	-	-
160,113	71,115	1,418,330	406,679	554,130	-	-	714,764	-
-	-	1,045,286	114,068	28,229	-	-	-	-
-	1,640	-	109,266	51,728	-	-	-	-
3,853,392	1,035,601	5,699,253	21,543,605	10,656,032	-	-	-	-
-	-	168,476	674,612	36,652	-	-	294,591	-
-	-	-	-	-	-	-	-	-
4,045,440	1,132,541	8,391,696	23,607,204	11,501,304	-	-	1,028,101	-
5,454,349	2,106,534	14,949,981	28,858,694	24,354,444	10,798	116,885	3,822,766	(3,450,071)
\$ 9,499,789	\$ 3,239,075	\$ 23,341,677	\$ 52,665,898	\$ 35,855,748	\$ 10,798	\$ 116,885	\$ 4,851,867	\$ (3,450,071)

Exhibit D

**LYONS TOWNSHIP SCHOOL TREASURER
TOWNSHIP 38 NORTH, RANGE 12 EAST**

FINANCIAL STATEMENTS

**FOR THE YEAR ENDED JUNE 30, 2003
AND
INDEPENDENT AUDITORS' REPORT**

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LYONS TOWNSHIP SCHOOL TREASURER

TABLE OF CONTENTS

JUNE 30, 2003

<u>EXHIBIT</u>	<u>PAGE</u>
Independent Auditors' Report.....	1

GENERAL PURPOSE FINANCIAL STATEMENTS

All Fund Types

A	Combined Balance Sheet.....	3
B	Statement of Revenues, Expenditures and Changes in Fund Balances	4
	Notes to Financial Statements	5

HISTORICAL PENSION INFORMATION (UNAUDITED)

Illinois Municipal Retirement Fund - Analysis of Funding Progress	12
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SCHEDULE

SUPPLEMENTARY SCHEDULE

1	Combined Balance Sheets	13
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TABLES

Medical and Dental Accounts

1	Assets and Liabilities Arising from Cash Transactions	15
2	Cash Receipts, Expenditures and Changes in Account Balances	16

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INDEPENDENT AUDITORS' REPORT

October 17, 2003

To the Board of Trustees
Lyons Township School Treasurer
Township 38 North, Range 12 East
930 Barnsdale Road
LaGrange Park, Illinois 60525

We have audited the accompanying general purpose financial statements of Lyons Township School Treasurer as of and for the year ended June 30, 2003, as listed in the table of contents. These financial statements are the responsibility of Lyons Township School Treasurer's management. Our responsibility is to express an opinion on these financial statements based on our audit.

Except as discussed in the following paragraph, we conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

The Lyons Township School Treasurer does not maintain detailed records of the historical cost of its fixed assets, primarily consisting of office furniture and equipment. The statement of general fixed assets required by generally accepted accounting principles is not included in the accompanying financial statements.

In our opinion, except that the omission of data described above results in an incomplete presentation as explained in the second paragraph, the general purpose financial statements referred to above present fairly, in all material respects, the financial position of Lyons Township School Treasurer as of June 30, 2003, and the results of its operations for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

Our audit of the 2003 financial statements was conducted for the purpose of forming an opinion on the general purpose financial statements taken as a whole. The financial information listed as a supplementary schedule and tables in the table of contents is presented for purposes of additional analysis and is not a required part of the aforementioned financial statements of Lyons Township School Treasurer. Such information has been subjected to the auditing procedures applied in the audit of the general purpose financial statements and, in our opinion, is fairly presented in all material respects in relation to the general purpose financial statements taken as a whole.

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The historical pension information listed in the table of contents is not a required part of the general purpose financial statements but is supplementary information required by the Governmental Accounting Standards Board. We have applied certain limited procedures, which consisted principally of inquiries of management regarding the methods of measurement and presentation of the supplementary information. However, we did not audit the information and express no opinion on it.

William F. Gurrie & Co Ltd
WILLIAM F. GURRIE & CO., LTD.

LYONS TOWNSHIP SCHOOL TREASURER
ALL FUND TYPES
COMBINED BALANCE SHEET
JUNE 30, 2003

			ACCOUNT GROUP	
	GENERAL FUND	FIDUCIARY FUND TYPE AGENCY FUND	GENERAL LONG-TERM DEBT	TOTAL (MEMORANDUM ONLY)
<u>ASSETS</u>				
Pro-rata Billings Due	\$ 1,008,900	\$ -	\$ -	\$ 1,008,900
Interest Receivable	425,167	-	-	425,167
Prepaid Items	18,531	-	-	18,531
Investments maintained for participating school districts	-	142,431,568	-	142,431,568
Amount to be provided from future receipts	-	-	24,208	24,208
Total Assets	<u>\$ 1,452,598</u>	<u>\$ 142,431,568</u>	<u>\$ 24,208</u>	<u>\$ 143,908,374</u>
<u>LIABILITIES AND FUND BALANCE</u>				
<u>Liabilities</u>				
Due to participating school districts	\$ -	\$ 142,431,568	\$ -	\$ 142,431,568
Cash Deficit	372,760	-	-	372,760
Accounts Payable	11,333	-	-	11,333
Salaries Payable	8,279	-	-	8,279
Deferred Revenue	1,154,675	-	-	1,154,675
Compensated Absences - long-term	-	-	24,208	24,208
Total Liabilities	<u>1,547,047</u>	<u>142,431,568</u>	<u>24,208</u>	<u>144,002,823</u>
<u>Fund Balance</u>				
Fund Balance (Deficit)	<u>(94,449)</u>	<u>-</u>	<u>-</u>	<u>(94,449)</u>
Total Liabilities and Fund Balance	<u>\$ 1,452,598</u>	<u>\$ 142,431,568</u>	<u>\$ 24,208</u>	<u>\$ 143,908,374</u>

See Notes to Financial Statements

LYONS TOWNSHIP SCHOOL TREASURER

GENERAL FUND

**STATEMENT OF REVENUES, EXPENDITURES
AND CHANGES IN FUND BALANCE
FOR THE YEAR ENDED JUNE 30, 2003**

	GENERAL FUND
<hr/>	
<u>RECEIPTS</u>	
Interest on Investments - net of distributions to school districts	\$ 3,256,195
Pro-rata Billings	630,151
Other	<u>8,245</u>
Total Receipts	<u>3,894,591</u>
 <u>EXPENDITURES</u>	
Current:	
Administrative:	
Salaries	330,211
Benefits	97,744
Purchased Services	250,038
Supplies	62,265
Other	<u>26,478</u>
Total Expenditures	<u>766,736</u>
 EXCESS (DEFICIENCY) OF RECEIPTS OVER EXPENDITURES	 3,127,855
 FUND BALANCE, BEGINNING OF YEAR	 <u>(3,222,304)</u>
 FUND BALANCE, END OF YEAR	 <u>\$ (94,449)</u>

See Notes to Financial Statements

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2003

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accounting policies of the Lyons Township School Treasurer (the "Treasurer") conform to the cash basis of accounting as defined by the Illinois State Board of Education Audit Guide. The following is a summary of the more significant accounting policies of the Treasurer:

A. Reporting Entity

In evaluating how to define the Treasurer for financial reporting purposes, management has considered all potential component units. The decision to include or exclude a potential component unit in the reporting entity is made by applying the criteria established by the Governmental Accounting Standards Board. The definition of a component unit is a legally separate organization for which the Treasurer is financially accountable and other organizations for which the nature and significance of their relationship with the Treasurer are such that exclusion would cause the reporting entity's financial statements to be misleading or incomplete. The Treasurer is financially accountable if it appoints a voting majority of the organization's governing body and (1) it is able to impose its will on that organization or (2) there is a potential for the organization to provide specific financial benefits to, or impose specific financial burdens on, the Treasurer. The Treasurer also may be financially accountable if an organization is fiscally dependent on the Treasurer, regardless of whether the organization has (1) a separately elected governing board, (2) a governing board appointed by a higher level of government or (3) a jointly appointed board. There are no component units, as defined by GASB, which are included in the Treasurer's reporting entity. Even though there are local government agencies within the geographic area served by the Treasurer, such as the various villages, schools, libraries and park districts, the agencies have been excluded from the report because they are legally separate and the Treasurer is not financially accountable for them.

Also, the Treasurer is not included as a component unit in any other governmental reporting entity, as defined by GASB pronouncements.

B. Measurement Focus, Basis of Accounting and Basis of Presentation

The accounts of the Treasurer are organized and operated on the basis of funds and account groups. A fund is an independent fiscal and accounting entity with a self-balancing set of accounts that comprise its assets, liabilities, reserves, fund balance, revenues and expenditures or expenses as appropriate. Fund accounting segregates funds according to their intended purpose, and is used to aid management in demonstrating compliance with finance-related legal and contractual provisions. The minimum number of funds is maintained consistent with legal and managerial requirements. Account groups are a reporting device to account for certain assets and liabilities of the governmental funds not recorded directly in those funds.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2003

The Treasurer has the following fund types:

Governmental Funds are used to account for the Treasurer's general government activities. Governmental fund types use the flow of current financial resources measurement focus and the modified accrual basis of accounting. Under the modified accrual basis of accounting, revenues are recognized when susceptible to accrual, i.e., when they are both "measurable and available". "Measurable" means that the amount of the transaction can be determined and "available" means collectible within the current period or soon enough thereafter to be used to pay liabilities of the current period. The Treasurer considers all revenues available if they are collected within 60 days after year-end. Expenditures are recorded when the related fund liability is incurred, except for unmatured principal and interest on general long-term debt which is recognized when due, and certain compensated absences, claims and judgements which are recognized when the obligations are expected to be liquidated with expendable available financial resources.

Interest on investments and pro-rata billings are susceptible to accrual. Other receipts become measurable and available when cash is received by the Treasurer and are recognized as revenue at that time.

Governmental Funds include the following fund type:

General Fund - The General Fund is the general operating fund of the Treasurer. It is used to account for all financial resources except those required to be accounted for in another fund. The General Fund consists of the following:

Distributive Account - This account is used for most of the administrative aspects of the Treasurer's operations. The revenue consists primarily of interest on investments and pro-rata billings from member School Districts.

Fiduciary Fund Types (Trust and Agency Funds) - Fiduciary Funds (Trust and Agency Funds) are used to account for assets held by the Treasurer in a trustee capacity or as an agent for individuals, private organizations, other governments or other funds.

Agency Fund - The Agency Fund includes cash and investments held and controlled by the Treasurer for the participating member districts.

General Fixed Assets and General Long-Term Debt Account Groups

An account group is used to establish accounting control and accountability for the Treasurer's general long-term debt. The accounting and financial reporting treatment applied to the long-term liabilities associated with a fund are determined by its measurement focus.

Long-Term Liabilities - Long-term liabilities expected to be financed from governmental funds are accounted for in the General Long-Term Debt Account Group, not in the governmental funds. The debt recorded in the District's General Long-Term Debt Account Group consists of compensated absences payable.

The account group is not a "fund." It is concerned only with the measurement of financial position. It is not involved with measurement of results of operations.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2003

C. Assets, Liabilities and Equity

Deposits and Investments

State statutes authorize the Treasurer to invest in obligations of the U.S. Treasury, certain highly-rated commercial paper, corporate bonds, repurchase agreements, and the State Treasurer's Investment Pool. Investments are stated at fair value.

Receivables and Payables

Transactions between funds that are representative of lending/borrowing arrangements outstanding at the end of the fiscal year are referred to as either "interfund receivables/payables" (i.e., the current portion of interfund loans) or "advances to/from other funds" (i.e., the non-current portion of interfund loans). All other outstanding balances between funds are reported as "due to/from other funds."

Prepaid Items

Certain payments to vendors that reflect costs applicable to future accounting periods are recorded as prepaid items.

Compensated Absences

Employees who have completed at least 60 work days are entitled to be compensated for vacation time. Vacations are to be taken in the following year in which they are earned. Unused vacation time may be taken as comparable time off or paid at the discretion of the Treasurer. Employees who resign or whose employment is terminated for any reason will be paid for unused vacation time.

Sick leave of 10 days per year is provided on a pro-rata basis to all employees. Unused sick leave can accumulate up to 240 days. Due to the nature of the policies on sick leave, and the fact that any liability is contingent upon future events and cannot be reasonably estimated, no liability is provided in the financial statements for accumulated unpaid sick leave.

Long-Term Obligations

The Treasurer reports long-term debt of governmental funds at face value in the general long-term debt account group. Certain other governmental fund obligations not expected to be financed with current available financial resources are also reported in the general long-term debt account group.

Memorandum Only - Total Columns

Total columns on the general-purpose financial statements are captioned as "Memorandum Only" because they do not represent consolidated financial information and are presented only to facilitate financial analysis. The amounts in these columns do not present information that reflects financial position, results of operations or cash flows in accordance with generally accepted accounting principles. Interfund eliminations have not been made in the aggregation of this data.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2003

Deficit Fund Equity

The General Fund had a deficit fund balance of \$94,449 as of June 30, 2003. The fund incurred expenditures that will be funded by future receipts from participating districts.

2. DETAILED NOTES ON ALL FUNDS AND ACCOUNT GROUPS

A. Deposits and Investments

Under the Illinois Compiled Statutes, the Lyons Township School Treasurer is the lawful custodian of all school funds. The Treasurer is appointed by the Township School Trustees, an independently elected body, to serve the school districts in the township. The Treasurer is the direct recipient of property taxes, replacement taxes and most state and federal aid and disburses school funds upon lawful order of the school board. The Treasurer invests excess funds at his discretion, subject to the legal restrictions discussed below. For these purposes, the Treasurer is permitted to combine monies from more than one fund of a single district and to combine monies of more than one district in the township. Monies combined under these circumstances, as well as investment earnings, are accounted for separately for each fund and/or district.

The Treasurer's investment policies are established by the Lyons Township School Trustees as prescribed by the Illinois School Code and the Illinois Compiled Statutes. The Treasurer is authorized to invest in obligations of the U.S. Treasury, backed by the full faith and credit of the U.S. Government, certificates of deposit issued by commercial banks and savings and loan associations, and commercial paper rated within the three highest classifications by at least two standard rating services (subject to certain limitations).

At year-end, the Treasurer's cash and investments totaled \$142,058,808. For disclosure purposes, this amount is segregated into three components: 1) cash on hand 2) deposits with financial institutions, which include amounts held in demand accounts, savings accounts and non-negotiable certificates of deposit; and 3) investments, which consist of all investments other than certificates of deposit. The carrying amount of cash on hand, deposits with financial institutions, and investments at year-end was \$200, \$23,883,401, and \$118,175,207, respectively.

At year-end, the bank balance of the Treasurer's deposits with financial institutions was \$28,295,042. Of this bank balance, \$10,019,932 was covered by federal depository insurance, or collateralized with securities held by the Treasurer or its agent in the Treasurer's name. Of the remaining balance, \$6,118,233 was collateralized with securities held by the pledging financial institution's trust department or agent in the Treasurer's name, and \$12,156,877 was uncollateralized, or collateralized with securities held by the pledging financial institution.

Investments are categorized into these three categories of credit risk:

1. Insured or registered, or securities held by the Treasurer or its agent in the Treasurer's name.
2. Uninsured and unregistered, with securities held by the counter-party's trust department or agent in the Treasurer's name.
3. Uninsured and unregistered, with securities held by the counter-party, or by its trust department or agent, but not in the Treasurer's name.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2003

At year-end, the Treasurer held the following investments for the school districts in the Township:

	<u>Category 2</u>	<u>Carrying Amount</u>	<u>Market Value</u>
U.S. Government Securities	\$ 49,935,652	\$ 49,935,652	\$ 49,969,365
Money Market Funds	5,609,862	5,609,862	5,609,862
Commercial Paper	2,995,290	2,995,290	2,995,290
Mutual Funds	<u>59,600,690</u>	<u>59,600,690</u>	<u>59,600,690</u>
Total	<u>\$ 118,141,494</u>	118,141,494	118,175,207
Illinois Funds		<u>358</u>	<u>358</u>
Total Investments		<u>\$ 118,141,852</u>	<u>\$ 118,175,565</u>

Illinois Funds is an investment pool managed by the State of Illinois, Office of the Treasurer, which allows governments within the State to pool their funds for investment purposes. Illinois Funds is not registered with the SEC as an investment company, but does operate in a manner consistent with Rule 2a7 of the Investment Company Act of 1940. Investments in Illinois Funds are valued at Illinois Funds' share price, which is the price the investment could be sold for.

3. LONG-TERM DEBT

Changes in General Long-term Liabilities. During the year ended June 30, 2003, the following changes occurred in liabilities which were reported in the general long-term debt account group:

	<u>Balance July 1, 2002</u>	<u>Additions</u>	<u>Reductions</u>	<u>Balance June 30, 2003</u>
Compensated absences	\$ 24,289	\$ 12,594	\$ 12,675	\$ 24,208
Totals	<u>\$ 24,289</u>	<u>\$ 12,594</u>	<u>\$ 12,675</u>	<u>\$ 24,208</u>

The obligations for the compensated absences will be repaid from the General Fund.

4. RISK MANAGEMENT

The Treasurer's Office is exposed to various risks of loss related to employee health benefits; workers' compensation claims; theft of, damage to, and destruction of assets; and natural disasters. The Treasurer has purchased insurance from private insurance companies for general liability, workers' compensation and other coverages not included below to mitigate these risks. Premiums have been recorded as expenditures in the appropriate funds. There have been no significant reductions in insurance coverage from coverage in the prior years.

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2003

5. ILLINOIS MUNICIPAL RETIREMENT

The Treasurer's defined benefit pension plan, Illinois Municipal Retirement Fund (IMRF), provides retirement, disability, annual cost of living adjustments and death benefits to plan members and beneficiaries. IMRF is an agent multiple-employer public employee retirement system that acts as a common investment and administrative agent for local governments and school districts in Illinois. The Illinois Pension Code establishes the benefit provisions of the plan that can only be amended by the Illinois General Assembly.

IMRF issues a financial report that includes financial statements and required supplementary information. That report may be obtained at www.imrf.org/pubs/pubs_homepage.htm or by writing to the Illinois Municipal Retirement Fund, 2211 York Road, Suite 500, Oak Brook, Illinois 60523.

Employees participating in IMRF are required to contribute 4.50 percent of their annual covered salary. The member rate is established by state statute. The Treasurer is required to contribute at an actuarially determined rate. The employer rate for calendar year 2002 was 9.22 percent of payroll. The employer contribution requirements are established and may be amended by the IMRF Board of Trustees. IMRF's unfunded actuarial accrued liability is being amortized as a level percentage of projected payroll on a closed basis. The remaining amortization period at December 31, 2002 was 30 years.

For December 31, 2002, the Treasurer's annual pension cost of \$26,267 was equal to the Treasurer's required and actual contributions. The required contribution was determined as part of the December 31, 2000 actuarial valuation using the entry age actuarial cost method. The actuarial assumptions included (a) 7.50% investment rate of return (net of administrative expenses), (b) projected salary increases ranging from 4.00% a year, attributable to inflation (c) additional projected salary increases ranging from 0.4% to 11.6% per year depending on age and service attributable to seniority/merit, and (d) post-retirement benefit increases of 3% annually. The actuarial value of IMRF assets was determined using techniques that smooth the effects of short-term volatility in the market value of investments over a five-year period. The assumptions used for the 2001 actuarial valuation were based on the 1996-1998 experience study.

However, the 2002 actuarial valuation information shown as required supplementary information is based on the assumptions derived from the 1999 - 2001 experience study. The effect of the assumption change increased the unfunded actuarial accrued liability by \$4,956.

6. RELATED PARTY TRANSACTIONS

The Lyons Township School Treasurer collects both pro-rata billings and insurance premiums from each member school district. Billings are used to pay for each District's pro-rata share of Township expenditures and insurance premiums are used to pay the insurance provider for monthly premiums to cover medical and dental claims. Due to the timing lag between billing each District and actual collections, some revenues collected after fiscal year end are considered receivable as of fiscal year end. As of June 20, 2003, the Treasurer's revenue receivables include the following:

LYONS TOWNSHIP SCHOOL TREASURER

NOTES TO FINANCIAL STATEMENTS

JUNE 30, 2003

Pro-Rata Billings Receivable

In prior years, certain participating districts failed to pay all or part of their pro-rata share of Township expenditures. The amount owed to the Lyons Township School Treasurer's Office at June 30, 2003 is \$1,008,900, which relates to billing periods through June 30, 2003. Approximately \$200,000 of this amount is expected to be collected within a year. The remainder relates to the pro-rata for 2003, which will be billed in 2004, but collected mostly in 2005.

7. PRONOUNCEMENT ISSUED BUT NOT YET ADOPTED

GASB Statement No. 34, Basic Financial Statements and Management's Discussion and Analysis for State and Local Governments, establishes financial reporting standards for state and local governments. Some of the more significant aspects of the new standard include: reporting the overall state of the government's financial health, not just individual funds; providing the most complete information available about the cost of delivering services to the citizens; including fixed asset accounting and depreciation; and including an introductory section analyzing the government's financial performance. The Treasurer is required to adopt this Statement for the fiscal year ending June 30, 2004. The adoption of this statement will have a material effect on the Treasurer's financial statements.

8. CHANGE IN BASIS OF ACCOUNTING

During the fiscal year ended June 30, 2003, the Treasurer changed its basis of accounting from the cash basis to the modified accrual basis for the General Fund. Prior period financial information presented in this report has also been restated to conform to the modified accrual basis of accounting. The following is the effect of restating prior years' fund balances to conform to the new basis of accounting:

	<u>General Fund</u>		<u>General Long Term Debt Account Group</u>
Fund Balance, 6-30-02, As Previously Reported	\$ (3,524,267)	Fund Balance, 6-30-02	\$ -
Effect of Conversion To Modified Accrual:		Effect of Conversion To Modified Accrual:	
Increase (Decrease) In Assets	1,556,391	Compensated Absences	<u>24,289</u>
(Increase) Decrease in Liabilities	<u>(1,254,428)</u>	Fund Balance, 6-30-02, As Restated	<u>\$ 24,289</u>
Fund Balance, 6-30-02, As Restated	<u>\$ (3,222,304)</u>		

LYONS TOWNSHIP SCHOOL TREASURER

ILLINOIS MUNICIPAL RETIREMENT FUND ANALYSIS OF FUNDING PROGRESS (UNAUDITED) JUNE 30, 2003

Actuarial Valuation Date	Annual Pension Cost (APC)	Percentage of APC Contributed	Net Pension Obligation
12/31/02	\$ 26,267	100%	\$ -
12/31/01	30,427	100%	-
12/31/00	29,074	100%	-
12/31/99	25,401	100%	-
12/31/98	26,443	100%	-
12/31/97	28,134	100%	-

Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial Accrued Liability (AAL) Entry Age (b)	Unfunded AAL- (UAAL) (b-a)	Funded Ratio (a/b)	Covered Payroll (c)	UAAL as a Percentage of Covered Payroll ((b-a)/c)
12/31/02	\$ 531,233	\$ 752,261	\$ 221,028	70.62%	\$ 284,891	77.58%
12/31/01	410,594	634,461	223,867	64.72%	298,309	75.05%
12/31/00	712,436	753,591	41,155	94.54%	260,517	15.80%
12/31/99	590,235	674,109	83,874	87.56%	220,693	38.00%
12/31/98	452,816	583,432	130,616	77.61%	200,329	65.20%
12/31/97	380,210	525,989	145,779	72.28%	212,814	68.50%

On a market value basis, the actuarial value of assets as of December 31, 2002 is \$321,670. On a market basis, the funded ratio would be 42.76%.

*Digest of Changes

2002 Assumptions

The actuarial assumptions used to determine the actuarial accrued liability for 2002 are based on the 1999-2001 Experience Study.

The principal changes were:

- Fewer members are expected to take refunds early their career.
- For Regular members, fewer normal and early retirements are expected to occur.

LYONS TOWNSHIP SCHOOL TREASURER

COMBINED BALANCE SHEETS JUNE 30, 2003

	Total	#69	#101	#102	#103	#104	#105	#106	#107
ASSETS									
Cash and Investments held by Treasurer	\$ 143,515,466	\$ 4,851,174	\$ 5,996,523	\$ 27,584,631	\$ 1,658,247	\$ 6,295,180	\$ 5,604,088	\$ 12,191,834	\$ 5,536,256
Cash and Investments held by District	1,457,104	25,110	96,594	143,523	66,645	51,121	12,145	56,804	22,296
Receivables (net of allowance for uncollectibles)									
Property taxes	81,689,089	1,755,150	5,339,213	10,176,065	5,762,535	4,995,399	5,253,694	4,691,644	3,848,045
Replacement taxes	1,017,198	16,713	104,736	-	204,345	77,041	111,997	6,133	38,220
Intergovernmental	5,134,154	37,076	99,282	615,372	480,805	378,625	117,894	146,625	104,711
Tuition	166,181	-	-	-	-	-	-	-	-
Interest	607,256	-	-	182,089	-	-	-	-	-
Other Current Assets	1,625,139	7,316	-	18,252	110,379	89,752	-	-	30,588
Due from Administrative Agent	144,600	-	-	-	-	-	-	-	-
Total Assets	\$ 235,337,187	\$ 6,692,539	\$ 11,636,648	\$ 38,719,932	\$ 8,296,056	\$ 11,887,118	\$ 11,099,498	\$ 17,093,040	\$ 9,581,113
LIABILITIES AND FUND BALANCE									
Liabilities:									
Payroll Deductions Payable	\$ 52,031	\$ 8,309	\$ (1,298)	\$ 9,889	\$ 17,703	\$ 4,021	\$ 544	\$ 21,552	\$ -
Due to Activity Fund Organizations	1,648,498	20,110	91,594	136,114	60,645	41,121	6,145	48,304	19,096
Accounts Payable	5,470,609	19,326	85,477	2,217,394	110,748	149,511	336,688	505,161	201,861
Salaries and Wages Payable	1,346,684	4,529	-	13,328	26,260	3,726	24,618	-	-
Compensated Absences	15,244	-	11,533	-	-	-	-	-	-
Deferred Revenue	83,376,215	1,683,976	5,435,934	10,252,013	5,787,878	5,128,393	5,253,694	4,691,644	3,858,066
Other Current Liabilities	1,696,269	-	27,280	144,600	89,207	-	-	12,744	21,400
Due to Joint Agreements	-	-	-	-	-	-	-	-	-
Total Liabilities	93,595,550	1,736,290	5,650,519	12,773,338	6,092,439	5,326,772	5,621,688	5,280,405	4,099,831
Fund Balance:									
Total Fund Balance	141,741,637	4,956,289	5,986,129	25,946,594	2,203,617	6,560,346	5,477,809	11,812,635	5,481,282
Total Liabilities and Fund Balance	\$ 235,337,187	\$ 6,692,539	\$ 11,636,648	\$ 38,719,932	\$ 8,296,056	\$ 11,887,118	\$ 11,099,498	\$ 17,093,040	\$ 9,581,113

#108	#109	#204	#217	HEADSTART	BASE	WEST 40	LADSE	INSURANCE ACCOUNTS	TREASURER'S OFFICE
\$ 1,920,356	\$ 19,512,529	\$ 29,397,865	\$ 21,195,192	\$ -	\$ -	\$ 287,428	\$ 4,126,391	\$ 356,481	\$ -
26,374	198,809	523,539	228,848	-	-	-	3,500	-	-
1,206,773	5,770,400	22,065,384	10,804,787	-	-	-	-	-	-
6,046	51,574	304,778	94,905	-	-	-	-	-	-
67,698	496,742	267,101	239,842	-	-	-	1,063,375	-	1,008,900
-	-	-	-	-	-	-	168,181	-	425,167
10,863	-	914,633	425,831	-	-	-	-	-	18,531
-	-	-	-	57,851	86,749	-	-	-	-
\$ 3,238,110	\$ 23,029,854	\$ 53,473,300	\$ 32,989,406	\$ 57,851	\$ 86,749	\$ 287,428	\$ 5,359,447	\$ 356,481	\$ 1,452,598
\$ 2,076	\$ -	\$ (11,532)	\$ (5,982)	\$ -	\$ -	\$ -	\$ 6,750	\$ -	\$ -
24,873	66,735	953,917	178,848	-	-	-	-	-	-
21,228	498,094	312,056	276,193	-	-	-	726,032	-	11,333
-	1,082,337	164,519	18,788	-	-	-	-	-	8,279
3,711	-	-	-	-	-	-	-	-	-
1,206,773	5,680,222	22,276,480	10,868,233	-	-	-	98,236	-	1,154,675
-	204,862	804,757	-	-	-	-	365,135	-	16,279
-	-	-	-	-	-	-	-	-	-
1,258,661	7,532,250	24,500,497	11,336,080	-	-	-	1,198,183	-	1,190,566
1,979,449	15,497,604	28,972,803	21,653,326	57,851	86,749	287,428	4,163,294	356,481	262,032
\$ 3,238,110	\$ 23,029,854	\$ 53,473,300	\$ 32,989,406	\$ 57,851	\$ 86,749	\$ 287,428	\$ 5,359,447	\$ 356,481	\$ 1,452,598

Table 1

LYONS TOWNSHIP SCHOOL TREASURER
INSURANCE ACCOUNTS
ASSETS AND LIABILITIES
ARISING FROM CASH TRANSACTIONS
JUNE 30, 2003

	MEDICAL SELF INSURANCE	DENTAL SELF INSURANCE	TOTAL INSURANCE ACCOUNTS
<u>ASSETS</u>			
Cash and Investments	\$ 188,459	\$ 168,022	\$ 356,481
Total Assets	\$ 188,459	\$ 168,022	\$ 356,481
<u>ACCOUNT BALANCE</u>			
Account Balance	188,459	168,022	356,481
Total Liabilities and Account Balance	\$ 188,459	\$ 168,022	\$ 356,481

Table 2

LYONS TOWNSHIP SCHOOL TREASURER**INSURANCE ACCOUNTS**

**CASH RECEIPTS, EXPENDITURES
AND CHANGES IN ACCOUNT BALANCES
FOR THE YEAR ENDED JUNE 30, 2003**

	MEDICAL SELF INSURANCE	DENTAL SELF INSURANCE	TOTAL INSURANCE ACCOUNTS
<u>RECEIPTS</u>			
Contributions from Participating Districts	\$ 4,609,522	\$ 246,063	\$ 4,855,585
Net Interest on Investments	<u>11,940</u>	<u>6,856</u>	<u>18,796</u>
Total Receipts	<u>4,621,462</u>	<u>252,919</u>	<u>4,874,381</u>
<u>EXPENDITURES</u>			
Claims by Employees	2,898,143	240,881	3,139,024
Co-Insurance Costs	383,605	-	383,605
Consulting Costs	36,998	-	36,998
Administrative Costs	370,617	-	370,617
Alternative Insurance Costs	648,636	-	648,636
Other	<u>11,954</u>	<u>1,262</u>	<u>13,216</u>
Total Expenditures	<u>4,349,953</u>	<u>242,143</u>	<u>4,592,096</u>
EXCESS OF RECEIPTS OVER EXPENDITURES	271,509	10,776	282,285
ACCOUNT BALANCE, BEGINNING OF YEAR	<u>(83,050)</u>	<u>157,246</u>	<u>74,196</u>
ACCOUNT BALANCE (DEFICIT), END OF YEAR	<u>\$ 188,459</u>	<u>\$ 168,022</u>	<u>\$ 356,481</u>

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Exhibit E

Lyons Township Matter
PM Analysis
March 1995

Calculation per Robert Healy				\$ 950,000.00	
District	Average Fund Bal.	Percentage	Interest		
101	2,679,457	2.75%	26,170		
102	12,351,698	12.70%	120,637		
103	9,698,916	9.97%	94,728		
104	4,475,398	4.60%	43,711		
105	4,469,463	4.60%	43,653		
106	6,381,225	6.56%	62,325		
107	5,608,123	5.77%	54,774		
108	620,722	0.64%	6,063		
109	7,958,944	8.18%	77,734		
204	26,166,713	26.90%	255,567		
204.5	2,625,262	2.70%	25,641		
217	12,675,799	13.03%	123,803		
995	48,484	0.05%	474		
999	1,102,996	1.13%	10,773		
69	404,482	0.42%	3,951		
Total	97,267,682	100.00%	950,000		

Adjusted Calculation Due to Fund Balance Error for District 107					
Adjusted Average Fund Bal.	Revised Percentage	Over/ (Under)	Revised Interest		
2,679,457	2.76%	0.01%	26,260		(90)
12,351,698	12.74%	0.04%	121,052		(415)
9,698,916	10.01%	0.03%	95,054		(326)
4,475,398	4.62%	0.02%	43,861		(150)
4,469,463	4.61%	0.02%	43,803		(150)
6,381,225	6.58%	0.02%	62,539		(214)
5,274,790	5.44%	-0.32%	51,695		3,078
620,722	0.64%	0.00%	6,083		(21)
7,958,944	8.21%	0.03%	78,001		(267)
26,166,713	26.99%	0.09%	256,445		(879)
2,625,262	2.71%	0.01%	25,729		(88)
12,675,799	13.08%	0.04%	124,229		(426)
48,484	0.05%		475		(2)
1,102,996	1.14%	0.00%	10,810		(37)
404,482	0.42%	0.00%	3,964		(14)
96,934,348	100.00%		950,000		0

Note: Healy utilized a different Fund Balance Number for his calculation than was represented on his "Quarterly Fund Balances (Averages)"

Exhibit F

Lyons Township Matter
PM Analysis
June 1997

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	<u>Calc Interest</u>	<u>Per</u>	
				<u>Healy</u>	<u>Diff</u>
			\$ 3,750,000.00		
101	7,601,186	5.60%	210,036	210,036	-
102	16,205,996	11.94%	447,805	447,805	-
103	14,260,418	10.51%	394,045	394,045	-
104	9,623,754	7.09%	265,924	210,660	(55,264)
105	7,490,604	5.52%	206,981	206,981	-
106	8,423,590	6.21%	232,761	232,762	1
107	6,270,689	4.62%	173,272	173,272	-
108	1,028,584	0.76%	28,422	28,421	(1)
109	7,767,690	5.72%	214,637	225,000	10,363
204	28,440,940	20.96%	785,882	830,785	44,903
204.5	4,999,514	3.68%	138,147	138,147	-
217	20,656,276	15.22%	570,776	570,776	-
995	58,548	0.04%	1,618	1,618	-
999	1,455,620	1.07%	40,222	40,222	-
69	1,428,496	1.05%	39,472	39,472	-
Total	135,711,905	100%	\$ 3,750,000	\$ 3,750,002	\$ 2

Exhibit G

Lyons Township Matter
PM Analysis
June 1998

District	Calculation per Robert Healy		
	Average Fund Bal.	Percentage	Interest
			\$ 4,000,000.00
101	9,841,500	6.39%	255,781
102	16,223,356	10.54%	421,646
103	13,037,374	8.47%	338,842
104	10,856,069	7.05%	282,150
105	7,858,402	5.11%	204,240
106	7,352,082	4.78%	191,081
107	7,366,529	4.79%	191,456
108	1,845,935	1.20%	47,976
109	9,265,101	6.02%	240,800
204	38,626,585	25.10%	1,003,907
204.5	4,996,009	3.25%	129,846
217	23,566,550	15.31%	612,496
995	78,528	0.05%	2,041
999	2,056,480	1.34%	53,448
69	934,588	0.61%	24,290
Total	153,905,087	100.00%	4,000,000

Adjusted Healy Calculation Due to Fund Balance Error for District 106				
Adjusted Average Fund Bal.	Revised Percentage	Over/ (Under)	\$ 4,000,000.00 Revised Interest	Diff
9,841,500	6.38%	-0.01%	255,245	536
16,223,356	10.52%	-0.02%	420,763	883
13,037,374	8.45%	-0.02%	338,132	710
10,856,069	7.04%	-0.01%	281,559	591
7,858,402	5.10%	-0.01%	203,812	428
7,675,085	4.98%	0.20%	199,058	(7,977)
7,366,529	4.78%	-0.01%	191,055	401
1,845,935	1.20%	0.00%	47,875	100
9,265,101	6.01%	-0.01%	240,296	504
38,626,585	25.05%	-0.05%	1,001,804	2,103
4,996,009	3.24%	-0.01%	129,575	272
23,566,550	15.28%	-0.03%	611,213	1,283
78,528	0.05%		2,037	4
2,056,480	1.33%	0.00%	53,336	112
934,588	0.61%	0.00%	24,239	51
154,228,090	100.00%		4,000,000	0

Note: Healy utilized a different Fund Balance Number for his calculation than was represented on his "Quarterly Fund Balances (Averages)"

Exhibit H

Lyons Township Matter
PM Analysis
June 2005

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	\$ 2,400,000.00		<u>Per Healy</u>	<u>Diff</u>
			<u>Calc</u>	<u>Interest</u>		
101	6,846,685	5.72%	137,371	137,370	(1)	
102	18,327,921	15.32%	367,728	367,727	(1)	
103	6,864,951	5.74%	137,737	137,737	(0)	
104	2,885,841	2.41%	57,901	57,900	(1)	
105	3,735,772	3.12%	74,954	74,953	(1)	
106	6,694,513	5.60%	134,317	134,257	(60)	
107	5,049,367	4.22%	101,310	101,309	(1)	
108	3,970,249	3.32%	79,658	76,046	(3,612)	
109	10,350,508	8.65%	207,671	207,844	173	
204	29,374,456	24.56%	589,363	589,363	(0)	
204.5	3,320,062	2.78%	66,613	66,613	(0)	
217	16,319,931	13.64%	327,440	327,439	(1)	
999	82,179	0.07%	1,649	1,648	(1)	
106.5	707,431	0.59%	14,194	86,543	72,349	
106.7	88,506	0.07%	1,776	1,776	0	
109	5,000,000	4.18%	100,319	99,875	(444)	
Total	119,618,372	100%	2,400,000	2,468,400	68,400	

Exhibit I

Lyons Township Matter
PM Analysis
June 2006

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	\$ 1,700,000		<u>Healy Interest</u>	<u>Diff</u>
			<u>Calc</u>	<u>Interest</u>		
101	12,210,655	6.79%	115,473	98,472	(17,001)	
102	24,115,827	13.42%	228,057	248,057	20,000	
103	13,177,278	7.33%	124,614	124,614	(0)	
104	4,334,811	2.41%	40,993	40,993	(0)	
105	7,073,005	3.93%	66,888	66,887	(1)	
106	11,253,080	6.26%	106,417	77,032	(29,385)	
107	8,812,845	4.90%	83,341	99,449	16,108	
108	2,895,110	1.61%	27,378	27,378	(0)	
109	16,715,506	9.30%	158,074	208,074	50,000	
204	43,210,453	24.04%	408,630	537,449	128,819	
217	28,200,160	15.69%	266,682	154,800	(111,882)	
999	754,148	0.42%	7,132	4,280	(2,852)	
106.5	754,019	0.42%	7,131	4,275	(2,856)	
204.5	6,259,091	3.48%	59,191	55,639	(3,552)	
Total	179,765,988	100.00%	1,700,000	1,747,399	47,399	

Exhibit J

Lyons Township Matter
PM Analysis
April 2008

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	1,240,000.00		<u>Healy Interest</u>	<u>Diff</u>
			<u>Calc Interest</u>			
101	10,283,783	5.68%	70,440	68,168	(2,272)	
102	21,859,343	12.07%	149,728	144,898	(4,830)	
103	11,408,814	6.30%	78,146	75,625	(2,521)	
104	10,120,759	5.59%	69,323	67,087	(2,236)	
105	9,006,250	4.97%	61,689	59,699	(1,990)	
106	12,085,835	6.68%	82,783	78,000	(4,783)	
106.5	551,580	0.30%	3,778	6,000	2,222	
107	9,231,806	5.10%	63,234	61,194	(2,040)	
108	3,521,876	1.95%	24,123	24,000	(123)	
109	15,386,074	8.50%	105,389	96,000	(9,389)	
204	38,562,277	21.30%	264,137	292,000	27,863	
204.5	7,882,742	4.35%	53,994	48,000	(5,994)	
217	28,409,111	15.69%	194,591	192,000	(2,591)	
999	2,721,833	1.50%	18,644	27,329	8,685	
Total	181,032,083	100.00%	1,240,000	1,240,000	(0)	

Exhibit J

Quarterly Distribution of Interest -
 April 2005 - for months Jan Feb March
 2005. pdf

Prepared By	Initials	Date
Approved By		

© WILSON JONES

Q1504 Column/Row 6

	1	2	3	4
1				
2	101	10 28970033	106	68168
3				
4	102	2183934972	112	149898
5				
6	103	1136881932	116	78625
7				
8	104	1012071916	106	67087
9				
10	105	900604965	105	59099
11				
12	106	1106583493	105	74500
13				
14	106.5	551134038	1005	1000
15				
16	107	963189579	105	61194
17				
18	108	3582189370	102	24000
19				
20	109	1536301368	105	46000
21				22000
22	204	2051201765	101	292000
23				
24	204.5	781174204	104	48000
25				
26	217	1049991133	116	192000
27				
28	999	272183281	102	27829
29				
30		18101208370	100	124000
31				127000
32				127000
33				
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40				

Produced - 5/22/2015

Exhibit K

Lyons Township Matter
PM Analysis
June 2009

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	1,800,000		<u>Diff</u>
			<u>Calc Interest</u>	<u>Healy Interest</u>	
101	10,705,239	5.38%	96,782	96,781	(1)
102	22,162,346	11.13%	200,361	200,361	(0)
103	13,821,523	6.94%	124,955	124,955	(0)
104	9,854,600	4.95%	89,092	89,092	0
105	12,910,090	6.48%	116,715	116,715	(0)
106	12,313,829	6.18%	111,325	111,325	0
107	11,158,088	5.60%	100,876	100,875	(1)
108	4,466,966	2.24%	40,384	40,384	(0)
109	17,405,447	8.74%	157,356	202,558	45,202
204	42,768,413	21.48%	386,653	633,364	246,711
204.5	5,369,253	2.70%	48,541	48,541	(0)
217	32,904,959	16.53%	297,481	297,480	(1)
999	2,925,220	1.47%	26,446	35,372	8,926
106.5	335,634	0.17%	3,034	3,034	(0)
Total	199,101,607	100.00%	1,800,000	2,100,837	300,837

Exhibit K

QDI - June 2009.pdf

Quarterly Distribution of Interest

1/5

JUNE, 2009

Prepared By	Initials	Date
Approved By		

WILSON JONES

GS04 Column 6

101	10705239	96789			
102	22162346	200321			
103	13821523	124955			
104	9854200	89092			
105	12910090	116715			
106	12313229	111325			
107	11758088	100825			
108	4466966	46984			
109	17405947	157755			
204	42701413	639364			
204.5	3869253	48541			
217	32907959	297780			
999	12915220	35732			
106.5	305644	3034			
TOTAL	119101617	1800000			
		250000			
		45203			
		2100037			

Produced - 5/22/2015

Exhibit L

Lyons Township Matter
PM Analysis
June 2012

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	1,750,000.00		<u>Diff</u>
			<u>Calc Interest</u>	<u>Healy Interest</u>	
101	12,455,201	5.19%	90,807	90,807	(0)
102	24,679,562	10.28%	179,931	179,931	(0)
103	19,658,039	8.19%	143,321	143,321	(0)
104	11,128,602	4.64%	81,135	81,135	(0)
105	16,081,388	6.70%	117,245	117,244	(1)
106	11,587,710	4.83%	84,483	84,482	(1)
106.5	62,575	0.03%	456	455	(1)
106.7	460,657	0.19%	3,359	3,358	(1)
107	14,914,449	6.21%	108,737	108,736	(1)
108	6,125,646	2.55%	44,660	44,660	(0)
109	23,424,263	9.76%	170,779	170,779	(0)
204	48,277,595	20.11%	351,978	336,977	(15,001)
204.5	7,730,489	3.22%	56,361	36,360	(20,001)
217	40,903,720	17.04%	298,217	298,217	(0)
999	2,541,670	1.06%	18,531	8,538	(9,993)
Total	240,031,566	100.00%	1,750,000	1,705,000	(45,000)

Exhibit L

Quarterly Distribution of Interest QDI - June 2012 - for month
 APRIL May June 2012.pdf
 JUNE 2012

FOR THE MONTH OF APRIL MAY & JUNE 2012

Prepared By	Initials	Date
Approved By		

WILSON JONES

5734 GREEN

DISTRICT			
101	12,453,201	90,807	✓
102	44,679,562	179,931	✓
103	19,059,009	143,321	✓
104	11,189,602	87,135	✓
105	16,071,388	119,244	✓
106	11,587,710	84,482	
106.5	62,573	455	✓
106.7	460,100	3358	✓
107	149,194,499	108,786	✓
108	61,256,916	44,160	✓
109	13,415,208	170,779	✓
201	48,677,595	346,977	✓
201.5	7,730,489	36,960	24 ✓
217	409,037,820	29,621	
999	2,591,670	8598	70
2,400,915,266			
17,500,000			
101	209,848,788	200,000	(109)36453
200	146,808,798	250,000	
202	176,796,103	250,000	
400	340,177,822	1750 -	
		7,150 -	
101	218,055,650		
191			

Exhibit M

Lyons Township Matter

PM Analysis

December 1997

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	<u>\$ 2,250,000.00 Calc Interest</u>	<u>Per Healy</u>	<u>Diff</u>	<u>WF Currie Adjustment</u>	<u>Adjusted Per Healy</u>
101	7,892,539	5.30%	119,202	119,202	0	4,174	123,376
102	14,801,837	9.94%	223,554	223,554	0	8,868	232,422
103	12,617,674	8.47%	190,566	190,566	(0)	7,872	198,438
104	9,627,103	6.46%	145,399	145,399	(0)	60,527	205,926
105	6,868,540	4.61%	103,736	103,736	(0)	4,132	107,868
106	8,052,014	5.40%	121,610	121,610	(0)	2,473	124,083
107	6,061,707	4.07%	91,551	91,551	0	3,524	95,075
108	1,667,760	1.12%	25,188	25,188	(0)	563	25,751
109	11,980,040	8.04%	180,936	180,936	0	(6,098)	174,838
204	40,930,769	27.47%	618,182	618,182	0	(101,830)	516,352
204.5	3,369,473	2.26%	50,890	50,890	0	2,673	53,563
217	21,481,141	14.42%	324,432	324,432	(0)	11,394	335,826
995	67,230	0.05%	1,015	1,015	(0)	36	1,051
999	1,577,257	1.06%	23,821	23,822	1	816	24,638
69	1,980,859	1.33%	29,917	29,917	(0)	876	30,793
Total	148,975,943	100%	\$ 2,250,000	\$ 2,250,000	\$ (0)	\$ -	\$ 2,250,000

Exhibit M

QPI - Dec 1997 - Averages.
pdf

Internet Distribution
Top Quarter Ave.

Prepared By	Initials	Date
Approved By		

D WILSON JONES COMPANY 67124 005 67124 005

	1	2	3	4	5
	Acc	Sec	Quadrant	M. F. C. Value	
			INT.	Ave	
101	789253866	118202	4774	123376	
102	1480176678	773554	8868	302422	
103	261767316	190566	7822	198438	
104	912710879	145399	60527	209926	
105	666159009	103736	4132	107768	
106	705201405	121610	2473	104623	
107	606170748	91559	7524	95075	
108	166776044	25188	723	25751	
109	1180004011	180936	< 6098 >	114898	
204	4043076902	618152	< 161890 >	516392	
204.5	336994271	50890	2673	53563	
217	2145014404	324432	11394	335826	
995	6722977	1015	36	1051	
999	157925661	23532	816	24638	
69	198088756	29917	87600	30793	
	225000000	-			
	118 975 94125				
	< 293 023.51 >				
	3,600, 000				

Produced - 7/15/2015

Exhibit N

Lyons Township Matter
PM Analysis
April 2007

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	\$ 1,500,000.00		<u>Per Healy</u>	<u>Diff</u>
			<u>Calc</u>	<u>Interest</u>		
101	15,037,003	9.09%	136,285	136,285	136,285	0
102	22,539,027	13.62%	204,278	204,278	204,278	0
103	8,072,278	4.88%	73,161	73,161	73,161	(0)
104	2,787,321	1.68%	25,262	25,262	25,262	(0)
105	6,758,494	4.08%	61,254	61,254	61,254	(0)
106	11,703,073	7.07%	106,068	106,068	106,068	(0)
106.5	897,393	0.54%	8,133	8,133	8,133	(0)
107	13,956,905	8.43%	126,495	126,495	126,495	(0)
108	2,975,434	1.80%	26,967	26,967	26,967	(0)
109	13,703,860	8.28%	124,202	124,202	124,202	0
204	35,317,252	21.34%	320,090	320,090	320,090	(0)
204.5	6,845,515	4.14%	62,043	62,043	62,043	0
217	23,780,133	14.37%	215,526	215,526	215,526	(0)
999	1,129,217	0.68%	10,234	10,234	10,234	(0)
Total	165,502,905	100%	\$ 1,500,000	\$ 1,500,000	\$ 1,499,998	\$ (2)

Exhibit N

Quarterly Distribution of Interest -
 April 2007 - for months Jan Feb March
 2007. pdf 41

District	Avg. Fd. Bal.	% of Total	Interest Dist.
101	\$15,037,003.05	9.09%	136,284.64 ✓
102	\$22,539,026.87	13.62%	204,277.62 ✓
103	\$8,072,277.56	4.88%	73,191.35 ✓
104	\$2,787,321.18	1.68%	25,282.29 ✓
105	\$6,758,493.77	4.08%	61,254.15 ✓
106	\$11,703,073.34	7.07%	106,068.29 ✓
106.5	\$897,393.45	0.54%	8,133.33 ✓
107	\$13,956,905.47	8.43%	126,495.41 ✓
108	\$2,975,433.98	1.80%	26,967.21 ✓
109	\$13,703,860.13	8.28%	124,201.99 ✓
204.5	\$35,317,252.45	21.34%	320,090.32 ✓ <i>+ 125,000.00</i>
204.5	\$6,845,515.22	4.14%	62,042.85 ✓
217	\$23,780,133.34	14.37%	215,526.12 ✓
999	\$1,129,217.45	0.68%	10,234.42
Total	\$165,502,907.26	100.00%	1,500,000.00 1500000

x 5/6 86,901.26

x x Adjusted at 6-70-07

109 45,000.00 in 5/07

Produced - 5/22/2015

Exhibit O

Lyons Township Matter

PM Analysis

January 2007

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	<u>\$ 1,000,000.00 Calc Interest</u>	<u>Per Healy</u>	<u>Diff</u>
101	10,665,834	5.77%	57,680	57,680	(0)
102	24,620,278	13.31%	133,145	133,145	(0)
103	15,344,655	8.30%	82,983	82,983	(0)
104	3,807,121	2.06%	20,589	20,588	(1)
105	6,884,632	3.72%	37,232	37,231	(1)
106	12,514,655	6.77%	67,679	67,667	(12)
107	16,577,196	8.96%	89,649	89,648	(1)
108	3,308,453	1.79%	17,892	17,891	(1)
109	16,278,159	8.80%	88,031	88,031	(0)
204	40,046,346	21.66%	216,569	216,568	(1)
204.5	3,953,180	2.14%	21,379	21,378	(1)
217	29,358,904	15.88%	158,771	158,772	1
106.5	508,148	0.27%	2,748	2,748	(0)
999	1,045,382	0.57%	5,653	5,670	17
Total	184,912,943	100%	\$ 1,000,000	\$ 1,000,000	\$ 0

Exhibit O

ODI - JAN 2007 - 8 months Oct Nov

LYONS TOWNSHIP SCHOOL TREASURER

Doc 3006.pdf

MONTHLY DISTRIBUTION OF FUNDS

JAN 2007

Initials	Date
Prepared By	
Approved By	

WILSON JONES

GT54 CalenderView

	1	2	3	4
1				
2	101	10465834	57080	
3				
4	102	24620278	153145	
5				
6	103	15344658	82483	
7				
8	104	38071221	20588	
9				
10	105	6884632	37131	
11				
12	106	12514255	67067	
13				
14	107	12577196	89698	
15				
16	108	3908435	17891	
17				
18	109	16278159	58038	
19				
20	204	40046386	216568	
21				
22	204.5	3953180	21378	
23				
24	217	49358904	158112	
25				
26	106.5	508148	2748	
27				
28	999	1045352	5670	
29				
30	TOTAL	184912943	1000000	
31				
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210358
185000
391258

Exhibit P

Lyons Township Matter
PM Analysis
October 2006

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	\$ 1,000,000.00		<u>Per Healy</u>	<u>Diff</u>
			<u>Calc</u>	<u>Interest</u>		
101	11,035,407	6.23%	62,342	62,342	62,342	(0)
102	23,443,530	13.24%	132,439	132,439	132,438	(1)
103	15,171,036	8.57%	85,705	85,705	85,705	(0)
104	3,782,019	2.14%	21,366	21,366	21,366	0
105	5,778,082	3.26%	32,642	32,642	32,641	(1)
106	10,761,147	6.08%	60,793	60,793	60,792	(1)
106.5	478,010	0.27%	2,700	2,700	2,700	(0)
107	16,684,897	9.43%	94,258	94,258	94,257	(1)
108	3,042,556	1.72%	17,188	17,188	17,188	(0)
109	16,157,290	9.13%	91,277	91,277	91,277	(0)
204	37,552,750	21.21%	212,146	212,146	212,145	(1)
204.5	3,592,329	2.03%	20,294	20,294	20,294	(0)
217	28,650,553	16.19%	161,855	161,855	161,854	(1)
999	884,198	0.50%	4,995	4,995	5,001	6
Total	177,013,804	100%	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ (0)

Exhibit P

QPI - Oct 2006 - for months July Aug

LYONS TOWNSHIP Office (Cellular) Sept 2006.pdf
 QUARTERLY DIST. OF INT.
 Oct, 2006

Prepared By	Initials	Date
Approved By		

© WILSON JONES

CT504 ColumnsWide 8

	1	2	3	4
1				
2	101	11035407	623412	
3	102	23443530	132437	
4	103	15171070	75705	
5	104	3788019	21366	
6	105	5775082	32241	
7	106	10761147	60792	
8	106.5	408210	2700	
9	107	14284847	94257	
10	108	3042556	17188	
11	109	10157230	41217	
12	204	17552756	212105	
13	204.5	3592329	20294	
14	217	28256533	161834	
15	999	584198	5001	
16	TOTAL	11063834	1000000	
17				
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Prof on line adjusted &
 City of Lyons
 dist. payment.

241 1254
 212105
 1671145

Exhibit Q

Lyons Township Matter
PM Analysis
November 2007

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	1,000,000.00		<u>Healy Interest</u>	<u>Diff</u>
			<u>Calc Interest</u>	<u>Interest</u>		
101	7,863,650	5.59%	55,885	55,885	(0)	
102	19,191,932	13.64%	136,393	136,393	(0)	
103	10,949,226	7.78%	77,814	77,814	0	
104	1,536,263	1.09%	10,918	10,918	0	
105	5,268,050	3.74%	37,439	37,439	0	
106	10,234,496	7.27%	72,735	72,735	0	
107	9,224,464	6.56%	65,556	65,556	(0)	
108	2,739,869	1.95%	19,472	19,472	0	
109	12,962,539	9.21%	92,122	92,123	1	
204	29,343,382	20.85%	208,538	208,538	0	
204.5	2,870,984	2.04%	20,404	20,403	(1)	
217	25,694,595	18.26%	182,606	182,606	(0)	
999	2,156,756	1.53%	15,328	15,328	0	
106.5	674,096	0.48%	4,791	4,790	(1)	
Total	140,710,302	100.00%	1,000,000	1,000,000	0	

Exhibit Q

QDT - Oct 2007.pdf

QUARTERLY DISTRIBUTION OF INTEREST
NOVEMBER 2007

Initialed	Date
Prepared By	
Approved By	

© WILSON JONES

GT504 Column/View 39

	1	2	3	4
	DISTRICT	AVERAGE BALANCE		
1				
2	101	786364968	55898	
3				
4	102	1919199243	136393	
5				
6	103	1094922579	77804	
7				
8	104	159626287	10918	
9				
10	105	582854974	37439	
11				
12	106	1083449367	72725	
13				
14	107	922444421	65502	
15				
16	108	273980670	19472	
17				
18	109	1296259885	92123	
19				
20	104	293929875	20858	10000
21				
22	204.5	287098438	20453	
23				
24	217	1569459535	18260600	
25				
26	999	213677550	15328	
27				
28	106.5	67409579	4790	
29				
30				
31		14071030075	100000000	
32				
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Produced - 5/22/2015

Exhibit R

Lyons Township Matter
PM Analysis
June 2011

<u>District</u>	<u>Average Fund Bal.</u>	<u>Percentage</u>	4,000,000.00		<u>Healy Interest</u>	<u>Diff</u>
			<u>Calc Interest</u>	<u>Interest</u>		
101	11,205,926	4.44%	177,794	177,794	(0)	
102	26,450,301	10.49%	419,663	419,663	(0)	
103	16,320,013	6.47%	258,935	258,934	(1)	
104	13,201,721	5.24%	209,460	209,459	(1)	
105	26,866,717	10.66%	426,270	426,269	(1)	
106	12,051,070	4.78%	191,203	191,203	(0)	
107	14,395,590	5.71%	228,402	228,401	(1)	
108	5,284,022	2.10%	83,837	83,836	(1)	
109	22,262,047	8.83%	353,212	353,211	(1)	
204	48,216,829	19.13%	765,013	565,012	(200,001)	
204.5	6,247,281	2.48%	99,120	99,119	(1)	
217	46,501,456	18.44%	737,797	737,796	(1)	
999	2,676,929	1.06%	42,472	42,472	(0)	
106.5	429,998	0.17%	6,822	6,831	9	
Total	252,109,900	100.00%	4,000,000	3,800,000		

Q01 - June 2011.pdf

113

Produced – 5/22/2015

Exhibit S

	Dr	Cr
100 BFB (Interest)		1,742,417
Cash	1,742,417	

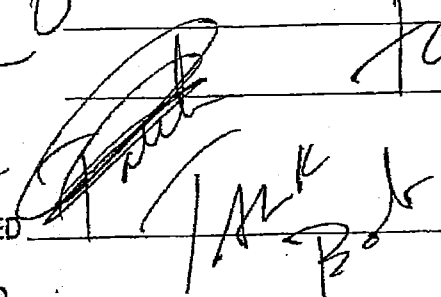
999 BFB (Interest)	<41,988>	
Cash		<41,988>

102 BFB (Interest)		55
Cash	55	

204 BFB (Interest)	<1,512,451>		2010 adjustment
Cash		<1,512,451>	but self-created in 2011

204.5 (LADSC) BFB (Interest)	<8,353>	
Cash		<8,353>

DESCRIPTION:

LO to

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Lo Lo
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 Balance to
 tell
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PREPARED

DATE

ENTERED

DATE

Exhibit S

ONE SIDED

REQUEST FOR POSTING ENTRY

LYONS TOWNSHIP SCHOOL TREASURER

DISTRICT # 204 MONTH JUN 6/2011

ACCOUNT NO. ^{AST} 1-999999 ^{AST} 1-101-3
VOUCHER _____
CHECK _____
AMOUNT _____
SUM CHECK <1,512,451.00> <1,512,451.00>

ACCOUNT NO. _____
VOUCHER _____
CHECK _____
AMOUNT _____
SUM _____

DESCRIPTION: Audit Adj - Interest

ENTERED IN EXCEL
BY: LD
07:10

PREPARED [Signature] DATE 6/11
ENTERED _____ DATE _____

POSTED
[Signature]

Exhibit S

DATE 10/10/2012

LYONS TOWNSHIP
*** DETAIL STATEMENT OF FUND ACCOUNTS ***

PAGE NO 1

DATE	VEND #	VEND NAME	DIST	TYP	DET #	INV #	PO #	DET DESCRIPTION	DET AMOUNT	O	
ACCT# /AST/	1 999999		0	0	0	EDUCATIONAL	BEG FUND BAL				
6/30/2011	0		204	J	0			J/E AUDIT ADJUSTMENT INTEREST	1,512,451.00	F	
									** ACCT \$ TOTAL:	1,512,451.00	*
** TOTAL # TRANSACTIONS: 1											

Exhibit S

DATE 10/09/2012

LYONS TOWNSHIP
*** DETAIL STATEMENT OF FUND ACCOUNTS ***

PAGE NO 1

DATE	VEND #	VEND NAME	DIST	TYP	DET #	INV #	PO #	DET DESCRIPTION	DET AMOUNT	OP
ACCT# /AST/	1	101	3	0	0	EDUCATIONAL CASH &		POOLED INVST		
6/30/2011	0				204 J	0		J/E AUDIT ADJUSTMENT INTEREST	1,512,451.00-	FG
8/01/2012	0				204 J	0		SITE/CONSTRUCTION & LIFE SAFET	54.89	LC
** TOTAL # TRANSACTIONS:									2	
									** ACCT \$ TOTAL:	1,512,396.11- **
ACCT# /AST/	1	999999	0	0	0	EDUCATIONAL BEG FUND BAL				
6/30/2011	0				204 J	0		J/E AUDIT ADJUSTMENT INTEREST	1,512,451.00-	FG
8/01/2012	0				204 J	0		SITE/CONSTRUCTION & LIFE SAFET	54.89	LC
** TOTAL # TRANSACTIONS:									2	
									** ACCT \$ TOTAL:	1,512,396.11- **

Exhibit S

PAGE NO 2

DATE 10/10/2012

LYONS TOWNSHIP
*** DETAIL STATEMENT OF FUND ACCOUNTS ***

	DISTRICT	DATE	ACCOUNT NUMBER	SPECIAL PARAMETERS
LOW PARAMS:	0204	6012011	0 0 0 0 0	BYP CASH ALL RESP BEG FLG=N
HIGH PARAMS:		6312011	999999 999999 999999 999 99999	J ONLY ALL ACCTS BUDG FLG=N
** TOTAL # TRANSACTIONS: 1				** ACCT \$ TOTAL: 1,512,451.00 *

EXHIBIT 20

STATE OF ILLINOIS)
) SS:
 COUNTY OF C O O K)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT - CHANCERY DIVISION

TOWNSHIP TRUSTEES OF)
 SCHOOLS TOWNSHIP 38)
 NORTH, RANGE 12 EAST,)

Plaintiff,)

-vs-

) No. 13 CH 23386

LYONS TOWNSHIP HIGH)
 SCHOOL DISTRICT 204,)

Defendant.)

The discovery deposition of JAMES MARTIN,
 taken before MAUREEN A. WOODMAN, a Certified
 Shorthand Reporter and Notary Public in and for
 the County of Cook and State of Illinois,
 pursuant to the Illinois Code of Civil
 Procedure and the Rules of the Supreme Court
 thereof, pertaining to the taking of
 depositions for the purpose of discovery at 20
 North Clark Street, Chicago, Illinois, on March
 30, 2017, at the hour of 1:00 o'clock p.m.

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES: 2 3 MILLER CANFIELD BY: MR. BARRY P. KALTENBACH 225 West Washington Street 4 Suite 2600 Chicago, Illinois 60606 5 312.460.4251 Kaltenbach@millercanfield.com, 6 On behalf of the Plaintiff, 7 8 HOFFMAN LEGAL BY: MR. JAY HOFFMAN 20 North Clark Street 9 Suite 2500 Chicago, Illinois 60602 10 312.899.0899 Jay@hoffmanlegal.com, 11 On behalf of the Defendant. 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 4</p> <p>1 2 (Witness was duly 3 sworn.) 4 JAMES MARTIN, 5 called as a witness herein, after having been 6 first duly sworn, was examined and testified as 7 follows: 8 THE WITNESS: Yes. 9 EXAMINATION 10 BY MR. HOFFMAN: 11 Q. Good afternoon, Mr. Martin. My name 12 is Jay Hoffman. I am the attorney for the 13 defendant in this case. The defendant is Lyons 14 Township High School, and if it's okay with 15 you, I'll refer -- we'll refer to that client 16 of mine as either-LT or District 204. Fair 17 enough? 18 A. Yes. 19 Q. You are the expert for the Plaintiff 20 in this case, which has a very long name, which 21 some people refer to as the TTO. Is that 22 acceptable to you? 23 A. Yes, sir. 24 Q. Thank you. Tell me how many</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX 2 WITNESS PAGE 3 JAMES MARTIN 4 Examination by Mr. Hoffman..... 4-180 5 6 ----- 7 8 EXHIBITS 9 DEPOSITION EXHIBIT PAGE 10 Exhibit 1 7 Exhibit 2 7 11 Exhibit 3 23 Exhibit 4 29 12 Exhibit 5 72 Exhibit 6 95 13 Exhibit 7 102 Exhibit 8 103 14 Exhibit 9 140 Exhibit 10 145 15 Exhibit 11 163 (NOT ATTACHED) 16 (Retained by Attorney Hoffman) 17 18 19 20 21 22 23 24</p>	<p style="text-align: right;">Page 5</p> <p>1 depositions you've given, please? 2 A. I'd say probably 10 or 12. 3 Q. You are an old pro. 4 I won't give you a lot of 5 instructions here except to tell you that if I 6 ask a question that you do not understand, 7 please let me know that, so I can ask you a 8 better question. Fair enough? 9 A. Yes. 10 Q. And you need to answer yes or no 11 rather than uh-huh or uh-uh, because those 12 latter two answers sound similar, and it's hard 13 for our court reporter to get that information 14 down. Okay? 15 A. Yes. 16 Q. Sir, where is your -- I see on your 17 business card you have offices listed for 18 Chicago and Bloomfield Hills, Michigan, 19 correct? 20 A. Yes. 21 Q. What is your primary office? 22 A. My personal primary office? 23 Q. Yes, sir. 24 A. Detroit.</p>

2 (Pages 2 to 5)

1 see that?

2 **A. Yes.**

3 Q. Do you know why you didn't get audit

4 statements for earlier years prior to 2006?

5 **A. No.**

6 Q. In the next grouping you've got more

7 statements, again these are starting in 2006.

8 Do you know what these documents were?

9 **A. Not offhand. I'd have to go back and**

10 **open the files.**

11 Q. Were the documents that had to do with

12 other districts other than District 204, were

13 some of those documents unavailable for

14 years -- that were on the earlier end of the

15 relevant time period for this case?

16 **A. I don't understand the question.**

17 Q. You were given a bunch of documents

18 relating to other districts, right?

19 **A. Yes.**

20 Q. Were those other district documents

21 complete or were they missing some years,

22 particularly earlier years? Because that's

23 what it looks like here.

24 **A. In total?**

1 Q. Yes.

2 **A. In total we had them all for the**

3 **interest general ledger account.**

4 Q. I'm not talking about just the general

5 ledger accounts. I mean were -- you got other

6 documents relating to districts like audit

7 reports and other things, yes?

8 **A. Yes.**

9 Q. And were some of those documents

10 relating to the other districts incomplete for

11 the entire time period that is relevant to the

12 case?

13 **A. Yes.**

14 Q. And describe the level of

15 incompleteness of the records pertaining to the

16 other districts.

17 **A. Well, like, for example, here in the**

18 **audits you can see they go back to 2006.**

19 Q. Right. If you turn the page, you've

20 got bank reconciliation packets, right?

21 **A. Yes.**

22 Q. And those go back only as far as 1999,

23 correct?

24 **A. Yes.**

1 Q. What impact did the lack of complete

2 documents have on your analysis?

3 **A. For these documents?**

4 Q. Or any of the documents we just

5 discussed, the documents relating to the other

6 districts, the documents relating to

7 reconciliations, other things.

8 **A. Yes. The documents I had were**

9 **sufficient to complete my analysis.**

10 Q. So you just spot checked the other

11 districts' years? How did you do it?

12 **A. We totalled other districts' years**

13 **from the -- it was the journal entry reports.**

14 Q. The general ledger reports?

15 **A. Yes.**

16 Q. Who is Ken Getty?

17 **A. I'm sorry?**

18 Q. Ken Getty. GETTY.

19 **A. I don't know.**

20 MR. HOFFMAN: Does he work at your firm?

21 MR. KALTENBACH: No.

22 BY MR. HOFFMAN:

23 Q. Sir, I'm marking Exhibit No. 4, this

24 is Plaintiff's Rule 213(F)(3) Expert

1 Disclosure-James P. Martin.

2 (WHEREUPON, said

3 document was marked as

4 Martin Deposition

5 Exhibit No. 4 for

6 Identification.)

7 You've seen this document before?

8 **A. Yes.**

9 Q. And you worked with Barry Kaltenbach

10 and/or people at his firm to prepare this?

11 **A. Yes.**

12 Q. And you read this document and it is

13 correct and complete, yes?

14 **A. Yes.**

15 Q. Let's turn to page two, please. In

16 the -- toward the middle of the page it reads,

17 "Mr. Martin is expected to testify," and it

18 goes on for the remainder of that paragraph,

19 the last complete paragraph on page two. Where

20 did you get that understanding of how the

21 process at the Treasurer's Office worked?

22 **A. From in terms of pooling investments**

23 **and investing on behalf of the districts?**

24 Q. Let's do this the hard way. It says

1 here -- it talks about revenues for the school
2 districts, right? And it makes a statement
3 here, "The treasurer maintained a summary of
4 the investments on a ledger and later an Excel
5 workbook." Do you see that?

6 A. Yes.

7 Q. What is the basis for your
8 understanding of that?

9 A. Those were the documents we were
10 provided.

11 Q. And then goes on to talk about, "The
12 treasurer maintained a general ledger for each
13 district. This tracked each district's fund
14 balances, e.g. education, transportation, et
15 cetera. This was used to calculate the
16 percentage of each district's ownership of the
17 fiduciary fund total. This percentage was used
18 to calculate the district's share of the
19 fiduciary fund as well as to allocate
20 investment income. Each quarter the treasurer
21 estimated a total investment income amount,
22 this amount was typically a round number."

23 What is your -- what is the basis
24 for that statement? Where did you get the

1 information to make that statement?

2 A. That was -- that's the information on
3 the Healy notes.

4 Q. When you say this amount was typically
5 a round number, wasn't it always a round
6 number?

7 A. It was a round number, I think, almost
8 every single time. I can't remember if there
9 were two or two where it wasn't a round number.
10 Almost always a round number.

11 Q. At least almost always, maybe always?

12 A. Yes.

13 Q. Then it says this calculation -- "The
14 treasurer applied the district's ownership
15 percentage to the estimated investment income
16 to determine the investment income to be
17 ascribed to each district." Do you see that
18 statement?

19 A. Yes.

20 Q. Is that what the treasurer did?

21 A. That's what's on the Healy notes.

22 Q. So you're looking at the Healy notes
23 and getting that information from the Healy
24 notes, correct?

1 A. Yes.

2 Q. Did you ever speak with Bob Healy?

3 A. No.

4 Q. Did anybody from your firm ever speak
5 to Bob Healy?

6 A. No.

7 Q. Why not?

8 A. I don't know.

9 Q. What do you mean you don't know?

10 Why wouldn't it be important for
11 somebody from your firm to at least try to
12 reach out to Bob Healy and ask him questions
13 about what he did with respect to investment
14 income?

15 A. We had his deposition transcript and I
16 read that.

17 Q. Did that answer all the questions that
18 you had?

19 A. As well as I would expect from another
20 conversation with him would be.

21 Q. So you thought because of the
22 deposition transcript you had for Bob Healy,
23 there was no need to ask Bob Healy any further
24 questions?

1 A. Right. Yes.

2 Q. And then it states in this disclosure,
3 "This calculation of investment income was used
4 to create a journal entry input into each
5 district general ledger. What is the source of
6 that statement?"

7 A. That's from the 205 reports. Let me
8 get the right name of that, if I could, please.

9 Q. I know what the general ledger is, but
10 that's not what this statement says. I know
11 what the general ledger is. You don't need to
12 tell me.

13 How did you know how the
14 information in Healy's notes were then made
15 part of the general ledger?

16 A. Oh, because you can --

17 Q. Who told you that?

18 A. No one told me, but you can see the
19 entries on the Healy notes as a journal entry
20 on the general ledger sheets.

21 Q. You also state in this disclosure, "No
22 formal reconciliation between the fiduciary
23 fund and the district general ledgers appears
24 to have been undertaken based on materials

1 would be connected given that – does it seem
 2 logical that those two numbers would be
 3 connected given that the numbers are different
 4 and that one relates to interest and one
 5 relates to expenses?
 6 MR. KALTENBACH: Hold on a minute, Jim.
 7 Same objection.
 8 MR. HOFFMAN: Settle down.
 9 MR. KALTENBACH: Jay, don't tell me to
 10 settle down.
 11 MR. HOFFMAN: Don't interrupt people when I
 12 am asking a question. You are objecting before
 13 a question is out of my mouth.
 14 MR. KALTENBACH: Your voice was trailing
 15 off, and I wanted to get the objection out
 16 before the witness answered, which I, generally
 17 speaking, try to do.
 18 BY MR. HOFFMAN:
 19 Q. May I get an answer to my question,
 20 please?
 21 THE WITNESS: Could you read the question,
 22 please.
 23 (Said question was read
 24 back.)

1 THE WITNESS: I have no idea.
 2 MR. HOFFMAN: Okay. Take a break.
 3 (Recess.)
 4 BY MR. HOFFMAN:
 5 Q. On page four we talked about your
 6 opinion as to an overallocation of
 7 \$1,427,442.04.
 8 A. Okay.
 9 Q. Right?
 10 A. Yes.
 11 Q. And that differs from the amount that
 12 was in Bradshaw's analysis, correct?
 13 A. Yes, it does.
 14 Q. And so I just want it clear on the
 15 record that your – and – Barry, you can fill
 16 us in on this, that this amount stated in the
 17 disclosure is the TTO position on damages for
 18 its interest claim in this case?
 19 MR. KALTENBACH: That's correct, and I sent
 20 you an e-mail to that earlier this week
 21 confirming that.
 22 THE WITNESS: Actually, reading this, if I
 23 can make a correction to a prior answer.
 24 BY MR. HOFFMAN:

1 Q. Sure.
 2 A. Just this last sentence here at the
 3 bottom, I think I misread that the first time
 4 where it said the workbooks. I think I said it
 5 was the Healy notes, but it actually is the
 6 Kelly Bradshaw workbooks.
 7 Q. So your reference was actually to
 8 Bradshaw's workbooks?
 9 A. Right.
 10 Q. So Bradshaw's workbooks captured
 11 information from Healy's notes as well as the
 12 general ledger, right?
 13 A. From Healy's notes and the general
 14 ledger, yes.
 15 Q. And so you didn't go back and trace
 16 the numbers in Bradshaw's report to see whether
 17 she had correctly pulled the numbers from
 18 Healy's notes or the general ledger, right?
 19 A. Oh, no. That's not right. I did
 20 both.
 21 Q. Did you?
 22 A. Yes. Absolutely.
 23 Q. For \$120,000, I would hope you did.
 24 A. Yes.

1 Q. So why are you saying that you did not
 2 assume that Bradshaw's workbooks were accurate
 3 or inaccurate, what does that mean?
 4 A. Well, I mean she wrote numbers down,
 5 but I would never assume them to be correct or
 6 incorrect. I had to verify – I did my own
 7 work on that.
 8 Q. You went back and tick and traced it
 9 as they say?
 10 A. Oh, yes. I created a separate sheet
 11 where it actually balanced out the – all the
 12 interest entries on the general ledgers.
 13 Q. And had Bradshaw made any mistakes
 14 that you found?
 15 A. Well, I don't know if it was mistakes.
 16 She misinterpreted – she interpreted some of
 17 the entries differently than I did.
 18 Q. And did you speak with Ms. Bradshaw
 19 about that?
 20 A. Yes.
 21 Q. And did she persuade you at any of her
 22 interpretations, or did you decide that your
 23 interpretations which differed from Ms.
 24 Bradshaw's were correct?

1 A. Well, it wasn't intended to be a
2 persuasive thing. I was asking her why she
3 didn't pick up a couple of the entries that
4 were in there.

5 She interpreted them differently
6 than I did, and I didn't change my opinion on
7 that.

8 Q. And these are the three changes that
9 you describe in the middle of page four of the
10 disclosure, yes?

11 A. Exactly.

12 Q. Did you make any assumption as to the
13 correctness or incorrectness of the Healy
14 notes?

15 A. No. Treated those as a business
16 record that were correct at that time.

17 Q. And why would you treat Mr. Healy's
18 notes as being correct given that he's a class
19 X felony who stole more than a million and a
20 half dollars from the districts?

21 A. They were the records that were
22 available from that time.

23 Q. Do you feel that Healy was a
24 trustworthy and reliable professional in light

1 allocated to each district?

2 A. Yes.

3 Q. So whatever amount Healy put in his
4 handwritten notes as to the allocation to each
5 district, is the amount that you believe should
6 have been paid to each district in that
7 quarter?

8 A. Not exactly. It really is the
9 proportion of the entries. It's the proportion
10 of the amounts.

11 Again, as we talked about
12 earlier, it's not that the amounts that are in
13 there equal the actual interest. It's the
14 proportion of the amounts by district.

15 Q. So fair enough.

16 What I'm saying is: In each of
17 Healy's handwritten notes there was -- I
18 understand they weren't all exactly the same,
19 but generally what they have is they have a
20 statement of the fund balances of each
21 district, the amount that he's going to
22 distribute as a total of all of the allocations
23 that he makes amongst the districts, correct?

24 A. Yes.

1 of his criminal record and history of theft?

2 MR. KALTENBACH: Same objection as before,
3 scope and form.

4 THE WITNESS: I wasn't really engaged to
5 opine on Mr. Healy's conduct.

6 BY MR. HOFFMAN:

7 Q. Let's dispense with the it's not
8 within the scope. I'm asking you a question as
9 an accountant and a professional.

10 And the question is: Do you have
11 any concerns relying on Healy's handwritten
12 notes as being what should have been
13 distributed given Healy's history of theft from
14 the funds that the TTO held for the districts?

15 A. No.

16 Q. Doesn't concern you at all?

17 A. No, not relying on the Healy's notes,
18 no.

19 Q. You are relying on the Healy's notes
20 as for what distributions should have been
21 made, right?

22 A. That's correct.

23 Q. Okay. Are you relying on the Healy
24 notes as to what amounts they state should be

1 Q. And in one quarter it may be that he's
2 going to -- he writes down \$10 million for the
3 distribution and then he writes down a specific
4 number for each of the districts in his notes,
5 correct?

6 A. Well, \$10 million would be
7 extraordinarily large. I don't recall any that
8 were quite that large, but that's the way it
9 would work though.

10 Q. Would you feel more comfortable with a
11 number of one million?

12 A. Yes.

13 Q. Terrific.

14 So in any given quarter, if he
15 intended to distribute a million dollars total
16 in interest, he also had specific numbers as to
17 the amount that two go to each district,
18 correct?

19 A. Yes.

20 Q. And did you rely on the specific
21 numbers that Healy set forth in his notes as to
22 the amount that each district should have been
23 allocated in that quarter?

24 A. Yes.

1 Q. So it wasn't just taking the total of
2 a million dollars for that particular quarter,
3 figuring out a percentage allocation and using
4 that number, you actually used the number that
5 Healy came up with on his sheet, right?

6 A. Yes.

7 Q. Okay. Now, in some of the sheets
8 there were little side calculations where, for
9 one or more of the districts, he did an
10 additional analysis as to interest income. Do
11 you remember seeing those?

12 A. Not specifically, no.

13 Q. I don't need to ask you what you did
14 in that circumstance, do I?

15 MR. KALTENBACH: Objection. Argumentative
16 and form.

17 BY MR. HOFFMAN:

18 Q. You say you don't remember seeing any
19 Healy handwritten notes in which there was a
20 little sidebar or adjacent analysis on finances
21 for one or more of the districts in addition to
22 the straight allocation of a distribution,
23 right?

24 A. Not offhand, no.

1 Q. So if I ask you what you did when
2 there was a little sidebar like that, what are
3 you going to tell me?

4 MR. KALTENBACH: I'm going to object. I
5 think that -- form of the question.

6 BY MR. HOFFMAN:

7 Q. So you don't remember there being any
8 separate calculation in Healy's notes in any
9 given quarter, therefore you don't remember
10 having to deal with the problem of what do I do
11 when there's a little side calculation set
12 forth?

13 A. Yeah, I'm not familiar with those
14 notes you're describing, so...

15 Q. Did you personally go through all of
16 Healy's notes?

17 A. Yes.

18 Q. And you don't remember seeing in any
19 of them a side calculation relating to one or
20 more districts in addition to the total
21 distribution across the districts that they all
22 have?

23 A. Not as I sit here today, no.

24 Q. Sir, this is one of the documents we

1 received from your counsel.

2 It's an Excel spreadsheet that we
3 printed out on paper and the title is Other
4 Districts' Comparison, right?

5 A. Yes.

6 (WHEREUPON, said
7 document was marked as
8 Martin Deposition
9 Exhibit No. 5 for
10 Identification.)

11 BY MR. HOFFMAN:

12 Q. Is there a document you created?

13 A. This was created by actually Mike
14 Maloziec, but I'm familiar with what this is
15 and what he did on it.

16 Q. What is it and what did he do?

17 A. He took the general ledger journal
18 entries for interest ascribed to other
19 districts, other than 204, and compared that to
20 the Healy notes.

21 Q. For what periods of time did he
22 perform this analysis?

23 A. Well, he didn't get all the way
24 through with this. As you can see, there's

1 some that are the -- where they're blank.
2 Basically it is the ones that show the big
3 difference on the right he didn't get to yet.
4 The ones that don't have the full fund balance
5 filled in. But it was really from 2005 through
6 2012.

7 Q. So why wasn't there any comparison
8 done prior to 2005?

9 A. Well, I mean, again, this was
10 to -- this was just to show that the districts
11 weren't also getting ascribed additional funds,
12 but we just started it with 2005 to 2012, just
13 a starting point.

14 Q. Why did you pick 2005?

15 A. 2005 was a breaking point it seemed
16 from the district that looked like there was
17 like a system that was implemented or something
18 because there were two sets of reports, there
19 was a set prior to that and then a set after
20 that.

21 Q. Did you not have this data for 2004
22 and earlier years?

23 A. Yes, we did.

24 Q. So when you say it is a break point,

1 what do you mean by that?

2 **A. There was one set of reports would go**
3 **through 2005 and then 2005 was another set of**
4 **reports. Either stored in different archive or**
5 **from a different system or something.**

6 Q. And so you for districts – the very
7 top is an analysis of one particular quarter
8 for all the districts, October 31st, 2011,
9 right?

10 **A. Yes.**

11 Q. And then you go through and for
12 Districts 101, 102 you run from late 2005
13 through mid 2012, correct?

14 **A. Yes.**

15 Q. And then for all of the other
16 districts, you do late 2005 through early 2008,
17 correct?

18 **A. I'm not following where you are.**

19 Q. Turn to the second page, middle.
20 Starting with District 103, that runs – you
21 got data that runs from 10/1/05 through
22 1/31/08. Do you see that?

23 **A. Yes, sir.**

24 Q. And then all of the remaining

1 Q. Well, are districts supposed to be
2 getting extra interest?

3 **A. They're not supposed to get interest**
4 **out of proportion with what the other districts**
5 **receive.**

6 Q. What did you interpret the extra in
7 the general ledger to mean?

8 **A. I didn't interpret it. We noted it**
9 **for follow-up.**

10 Q. Did you follow up on that?

11 **A. Certainly will at the correct time,**
12 **yes.**

13 Q. You're being deposed now, and your
14 expert report was due March 15th. When would
15 the correct time be?

16 **A. Well, this would be – again, the**
17 **purpose of this analysis was to show that the**
18 **other districts weren't also getting interest**
19 **out – weren't getting additional interest at**
20 **the time that 204 was.**

21 Q. You just told me in the tenth line, or
22 thereabouts, about the tenth row, there's extra
23 interest, according to the general ledger, paid
24 to District 109, right?

1 districts only go through that same time
2 period, just late 2005 through the first month
3 of 2008.

4 **A. Yes.**

5 Q. And it was your opinion that this was
6 a sufficient sample to prove your point?

7 **A. Yes.**

8 Q. And let me ask you, why are some of
9 the cells highlighted in yellow?

10 **A. Those were things that were on there**
11 **that we had a question for follow-up on. So,**
12 **for example, there's an entry, you can see the**
13 **note over there, you know, just, for example,**
14 **the first one for District 109, if you look at**
15 **the GL, there's an entry that says extra. Some**
16 **of these other ones say interest without being**
17 **quarterly interest.**

18 Q. Let's start with that one. When you
19 say there's something that says extra, what is
20 that?

21 **A. If you look at the GL for District 109**
22 **for 2011, again, each one of those is a 15-page**
23 **report, but in all the detail in there, there**
24 **is one entry that says extra.**

1 **A. Well, no, I don't know if that's extra**
2 **interest paid to them. There's an entry that**
3 **says extra that I didn't know what it was.**

4 Q. Did you attempt to find out?

5 **A. Not yet, no.**

6 Q. When are you planning on doing that?

7 **A. At some point we'll report that to the**
8 **trustee's office.**

9 Q. Why didn't you do it before today so
10 that we could talk about it?

11 **A. I don't know.**

12 Q. You spent \$120,000 in fees on this.
13 How come there's work that still has to be
14 done?

15 MR. KALTENBACH: I object as argumentative.
16 BY MR. HOFFMAN:

17 Q. You can answer.

18 **A. Well, I guess we'd have to report that**
19 **to the trustee's office.**

20 Q. How much extra did – how much is the
21 amount described as extra, whatever that means,
22 for 109 and – for District 109 on the
23 10/31/2011 quarter, what's the extra amount?

24 **A. I don't know. I'd have to pull that**

1 Q. What was the purpose at looking at the
2 audit reports?

3 You testified earlier it was to
4 get background information about how the system
5 worked; is that right?

6 **A. Exactly right. How they did**
7 **accounting, what their procedures were, things**
8 **like that.**

9 Q. Did you see in some of the years, in
10 particular in '95 through 2007, that there were
11 statements in the TTO audit reports-for the
12 amount of money they took in for interest on
13 the pooled investments and the amount of money
14 they distributed out or at least the net of
15 those two numbers?

16 **A. No.**

17 Q. But you read these but you didn't
18 notice those entries?

19 **A. I didn't read those - I did not read**
20 **the audit reports that far back.**

21 Q. How far back did you go?

22 **A. 2008.**

23 Q. It's funny, that's exactly the year
24 where that information ceases to be on the

1 the same page.

2 **A. Yes, this one.**

3 Q. You see under receipts, the very first
4 line has earnings on investments and then a
5 negative number for earnings on investments
6 distributed to school districts and then a line
7 for net earnings on investments?

8 **A. Yes, I see that.**

9 Q. Okay. And you see that there's a
10 comparison in this statement for the numbers
11 for 2007 fiscal year to the numbers for 2006
12 fiscal year, correct?

13 **A. Yes, that's the column over here.**

14 Q. In each year the TTO retained a little
15 over a million dollars in each of those years
16 in net earnings on investments, correct?

17 **A. That's what it shows on here, yes.**

18 Q. Okay. And do you know of any reason
19 why the - did anybody from - do you remember
20 reading in the deposition of Dr. Birkenmaier a
21 discussion about these net earnings on
22 investment figures in the audit reports?

23 **A. Vaguely.**

24 Q. I mean did reading that make you

1 audit reports.

2 **A. Really?**

3 Q. Yes. Is that coincidence or did
4 somebody tell you to start looking at them in
5 2008?

6 **A. No, I think I looked at the ones that**
7 **were on the website.**

8 Q. Okay. Let's take a - let's take a
9 look at 2007. I'll hand that to you. I can
10 get you the right page. It's pretty easy.

11 MR. KALTENBACH: Is there an exhibit number
12 on it?

13 MR. HOFFMAN: Yes. So this is TTO
14 Deposition Exhibit No. 19. That's from Susan
15 Birkenmaier's deposition.

16 BY MR. HOFFMAN:

17 Q. Let me get to the page. We're looking
18 at the 2007 audit report, page 13. And
19 statement of revenue expenditures and changes
20 in fund balance for the governmental fund in
21 the TTO audit, right? We're looking at the
22 same page?

23 **A. Oh, yeah.**

24 Q. I want to make sure you're looking at

1 interested in going back and looking at the
2 audit reports and seeing what they had to say
3 about investment earnings?

4 **A. No.**

5 Q. Why not?

6 **A. Well, again, this is related to the**
7 **amount that was - the difference between the**
8 **actual earnings and the distribution earnings.**
9 Q. Right. And so what you're saying, if
10 the TTO over this two-year fiscal period held
11 on to over \$2 million in investment income
12 earned, it doesn't affect your analysis because
13 it would just be money that would be payable to
14 all of the districts proportionately?

15 **A. In their proper proportion, yes. Same**
16 **proportion by all the districts, according to**
17 **their proportions, yes.**

18 Q. So I guess my question is: If this \$2
19 million, for example, is still sitting in an
20 account at the TTO, would that be money that
21 District 204 would be entitled to receive and
22 should be offset against the \$1.4 million
23 damage claim that you came up with?

24 **A. I have no idea.**

1 the other districts got uniformly underpaid
2 interest for this relevant time period because
3 District 204 was overpaid, right?

4 **A. I made the opinion that District 204**
5 **received interest out of formula with the**
6 **percentages that were — should have been**
7 **ascribed to them versus what the other**
8 **districts should have gotten.**

9 Q. That's not my question. That wasn't
10 what I asked you.

11 What I asked you was: You
12 earlier articulated in this deposition an
13 opinion that the other districts got shorted in
14 an equal and proportionate amount because
15 District 204 got too much for the entirety of
16 this period, right?

17 **A. That's what the effect of that would**
18 **be, yes.**

19 Q. But that's not the effect of it if the
20 other districts were not getting paid in a
21 proportionate amount or way, isn't that true?
22 If the other districts got paid
23 disproportionately, like you claim 204 did,
24 then your opinion would be incorrect as to the

1 other districts?

2 **A. Well, no. Those districts would need**
3 **to be adjusted as well theoretically. But for**
4 **those periods where I have identified a**
5 **misallocation in 204, the other districts got**
6 **exactly the percentage that's detailed on the**
7 **Healy notes.**

8 Q. Well, they certainly don't — that's
9 not what's indicated on this document Martin
10 Exhibit No. 10, is it, based on the Gurrie
11 adjustments?

12 **A. I have no idea what's indicated by the**
13 **Gurrie adjustments.**

14 Q. So you have no idea whether Healy
15 intended to follow these Gurrie adjustments or
16 not, do you?

17 **A. I have no idea if he implemented**
18 **those.**

19 Q. And you have no idea why Gurrie was
20 recommending these adjustments, do you?

21 **A. No, I don't.**

22 Q. Okay. Let's take a look at the
23 disclosure again.

24 MR. KALTENBACH: I think we're over three

1 hours, but I won't object to you going a little
2 longer.

3 BY MR. HOFFMAN:

4 Q. Page four. On page four, sir, you
5 talk about corrections that you made, right?

6 **A. You mean here in the middle paragraph?**

7 Q. First large paragraph.

8 **A. Yes.**

9 Q. You talk about the entry for 6/30/04
10 should be \$147,979,000?

11 **A. Yes.**

12 Q. But you see that further down in the
13 paragraph you don't make an adjustment to
14 fiscal year 2004. Can you explain why not?

15 **A. No, I don't. That's odd.**

16 Q. And this is one of the three
17 corrections you made to Bradshaw, and you're
18 unable to verify — why don't you tell me what
19 you're finding, sir. You understand the
20 question, right?

21 **A. Oh, yes.**

22 Q. Go ahead and tell me what you're
23 finding and what you're looking at.

24 **A. Well, tracing from Martin 4 to**

1 **calculations on Martin 7 to see how that would**
2 **be, so...**

3 Q. Okay. We're looking at your
4 correction for the entry for 6/30/04 which you
5 say should be \$147,979, right?

6 **A. Yes.**

7 Q. Yet, you don't make an adjustment to
8 fiscal year 2004 later on in the disclosure.
9 And the question is why?

10 **A. I think it was just omitted from**
11 **the — this paragraph here.**

12 Q. Is that what you think or — is that
13 what you know?

14 **A. That's what I know.**

15 Q. I don't want you to guess.

16 **A. There should be a line in here that**
17 **says the new amount.**

18 Q. So —

19 **A. It was just an oversight.**

20 Q. So tell me how this disclosure should
21 read in order to be correct based on your
22 analysis of the records you just looked at?

23 **A. Right. The disclosure in terms of the**
24 **total, the total damage amount, for lack of a**

EXHIBIT 21

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

TOWNSHIP TRUSTEES OF SCHOOLS)	
TOWNSHIP 38 NORTH, RANGE 12 EAST,)	
)	
Plaintiff and Counter-Defendant,)	No. 13 CH 23386
)	
v.)	Hon. Sophia H. Hall
)	
LYONS TOWNSHIP HIGH SCHOOL)	Calendar 14
DISTRICT 204,)	
)	
Defendant and Counter-Plaintiff.)	

**DEFENDANT AND COUNTER-PLAINTIFF LT'S FIRST AMENDED AFFIRMATIVE
DEFENSES TO THE TTO'S FIRST AMENDED COMPLAINT,
AND LT'S SECOND AMENDED COUNTERCLAIM (VERIFIED)**

Defendant and Counter-Plaintiff Lyons Township High School District 204 ("LT") asserts the following First Amended Affirmative Defenses to the First Amended Complaint of Plaintiff Township Trustees of Schools Township 38 North, Range 12 East ("the TTO"); and the following Second Amended Counterclaim.

**First Amended Affirmative Defenses
To First Amended Complaint**

Factual Background: Payments for LT's Business Functions

1. During the period of time relevant to this case, from 1992 through 2012, LT and the TTO had a difficult and, at times contentious, relationship. LT had little faith or trust in the competence and integrity of the TTO to perform its statutorily mandated functions. The TTO objected to providing meaningful information and supporting documentation to LT concerning the investment funds that the TTO managed, the expenses that the TTO incurred, and the many questions that LT and other member districts raised about the TTO's operations.



2. During the relevant period, the TTO operated with no meaningful oversight. The TTO's Treasurer and Trustees lacked accounting and investment experience and assumed their positions based on their politics and not merit. This created an environment in which the Treasurer, over a period of years, was able to steal millions of dollars belonging to LT and the other member districts.

3. During the relevant period, LT performed its own business/accounting functions – essentially, accounts payable, payroll, accounting computer services, and check preparation – through the employment of its own skilled and trained personnel. LT refused the TTO's invitations to take the business functions at LT inside the TTO's office due to LT's legitimate concerns about the ability of the TTO's personnel and systems to handle the complex functions needed for LT's large high school operations.

4. LT's performance of its own business functions meant that the TTO did not have to hire and pay for additional employees in order to perform LT's business functions.

5. During the relevant period, the chief administrator for the TTO was Lyons Township School Treasurer Robert G. Healy ("Healy").

6. During the relevant period, Healy sent LT an annual invoice for LT's pro rata share of the TTO's expenditures. These invoices were substantial, in the range of \$150,000 to \$200,000 for most of the relevant years (and, unfortunately, significantly higher in more recent years). This meant that in years that included the 1990's, LT paid the direct costs of its own business functions, plus an approximately 25 percent share of the TTO's services, which LT not want or need to use.

7. This inequity was the subject of many communications in 1999 between LT and the TTO.

8. On May 28, 1999, Healy attended the meeting of the Finance Committee of the Board of Education for LT. According to the minutes, the Finance Committee "directed Mr. Healy and Dr. Beckwith to work during the summer months to prepare options for the Board of Education to review that would provide more equity in the services provided the District."

9. On July 27, 1999, the Board of Trustees for the TTO held a regular meeting. As reflected in the minutes, "There was a discussion regarding Lyons Township High School and the problems the district has with the Pro Rata billing system. The Trustees discussed with Treasurer Healy several options to improve relations with the high school. Some of the items discussed are for the Treasurer's office to assume more duties, possibly fund certain business functions, computer sharing and legislation."

10. On August 18, 1999, Healy sent Beckwith a long letter ("the 8/18/1999 Letter", attached as Exhibit A) concerning the "Pro-Rata Billing System." Healy said that the letter was "[i]n response to our most recent discussion regarding the possibility of instituting certain measures to balance the efforts of our respective staffs." Healy said that he was presenting "proposed possible solutions." The letter contains five distinct proposals from the TTO to LT.

11. The first proposal in the 8/18/1999 Letter was entitled "Deviation from Pro-Rata Billing." Healy said that the first proposal would involve LT not paying its pro rata share of the TTO's expenses, and having the other eleven member districts absorb LT's share. Healy represented that this proposal would require all twelve member districts to sign an intergovernmental agreement, which Healy said was "highly unlikely."

12. The second proposal in the 8/18/1999 Letter was entitled "Funding by Township School Treasurer of Some District Functions." This was the proposal that Healy recommended to LT. Healy explained, "If the responsibilities for the Accounts Payable and Payroll production

were returned to the School Treasurer's office [*i.e.*, the TTO] it would mean higher operating costs for the Treasurer's office in the form of salaries and benefits for increased staff and higher related expenses to accommodate the increase in work load."

13. In the 8/18/1999 Letter, Healy explained why the TTO's Board of Trustees was likely to approve the second proposal: "I would expect that when the Trustees of Schools takes into consideration these necessary increases, they would logically conclude that a partial funding by the Treasurer's office to cover District 204's costs for the business functions District 204 now performs would be reasonable. Especially in light of the fact that the Treasurer's office is currently performing the same business functions for the eleven other districts."

14. In the 8/18/1999 Letter, Healy represented that unlike the first proposal, the second proposal would not require an intergovernmental agreement or the consent of the other member districts.

15. The 8/18/1999 Letter contained three more proposals, none of which Healy recommended. The third was for the TTO to take over LT's business functions. The fourth was to change the pro-rata billing system through legislative action. The fifth was for the TTO to use LT's computer system.

16. Healy sent copies of the 8/18/1999 Letter to the members of the TTO's Board of Trustees.

17. On September 29, 1999, the Finance Committee of LT met and considered Healy's written proposals. Healy was present at the meeting. The Finance Committee decided to proceed with the second proposal spelled out in Healy's letter, and asked Beckwith and Healy to work on a definitive agreement: "The committee directed Dr. Beckwith to work with Mr. Healy to further define the costs of the business office that can be charged to the Treasurer's office. These charges

could include salaries for the accounts payable, payroll and computer services staff. Also an amount for computer processing was discussed. In addition to salaries, costs associated with reconciliation, printing of checks, audit, legal fees and office costs could also be transferred to the Treasurer's office. These costs would be included in the Treasurer's pro rata billing. Mr. Healy indicated the Township Board of Trustees is supportive of this method."

18. Healy and Beckwith negotiated the terms of a written agreement that fleshed out Healy's second option in the 8/18/1999 Letter. In the February 29, 2000 Memorandum that Beckwith sent to Healy ("the 2/29/2000 Memo," attached as Exhibit B), LT provided the TTO with the specific responsibilities that the TTO would pay LT to perform in-house during the 2000 fiscal year:

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable., payroll, imprest, and student activities.
- Annual salary and benefits costs for 3 employees as listed below:

[Three job positions listed, with salary and benefit costs specified for each, for a total cost for the 1999-2000 fiscal year of \$106,403.]

An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the year.

19. On March 21, 2000, the Board of Trustees of the TTO conducted a regular meeting. The Agenda for the meeting included an item for "8. District 204 Business Office." The meeting packet that the TTO produced in this case show that the Trustees received a copy of the written agreement set forth in the 2/29/2000 Memo.

20. According to the meeting minutes for the March 21, 2000 meeting, Healy presented the written agreement to the Trustees for their approval. Healy explained to the Trustees the basis on which he recommended the approval of this agreement:

Healy submitted to the Trustees the proposal from District 204 stating that this office absorb certain payroll, accounts payable and computer processing expenditures by District 204. As these costs would be incurred by the Treasurer's office if Lyons Township High School were to totally utilize the facilities of the Treasurer's office.

21. The Trustees of the TTO who attended the March 21, 2000 meeting then voted unanimously to approve the agreement between LT and the TTO:

A motion was made by Russell Hartigan seconded by Joseph Nekola to accept the proposal given to the Lyons Township Trustees of Schools by Cook County High School District #204.

ROLL CALL: Ayes – Joseph Nekola, Russell Hartigan
Nays – None

22. On March 22, 2000, the Finance Committee of LT met and discussed the agreement with the TTO. According to the minutes, "The Committee reviewed the recommended changes in the Township Treasurer billing. The billing will include transferring the cost of 3 business office staff salaries and benefits to the Township Treasurer."

23. On June 14, 2000, Beckwith wrote a memorandum to the Board of Education of LT. Beckwith explained the details of the implementation of the agreement with the TTO and provided copies of the key documents – including the TTO's pro rata expense invoice and the 2/29/2000 Memo setting forth the terms of the agreement. Beckwith explained that the TTO's invoice was for \$165,476, and that the Treasurer would pay \$106,403 for the business functions at LT. Beckwith asked the Board to approve the agreement by authorizing the net payment to the TTO.

24. On June 19, 2000, the Board of Education of LT held a regular meeting. The agenda includes a line item for "P. Township Treasurer's Invoice." The minutes state that the

Board received the "Township Treasurer's Invoice Exhibit T," which was a copy of Beckwith's June 14, 2000 memorandum. The Board approved the recommended handling of the TTO's pro rata invoice and the offset for the TTO's agreement to pay the costs of LT's business functions by a unanimous vote of all present Board members on the consent agenda.

25. On or about July 15, 2000, LT authorized payment to the TTO of \$59,073. The TTO accepted this amount as full payment of LT's pro rata share of the TTO's expenses as offset by the costs of LT's business functions.

26. In each year from 2001 through 2012, the TTO and LT took affirmative steps, with the approval of both boards, to reaffirm their agreement on the payment of LT's business functions and accept the specific financial terms applicable to each year.

27. On September 7, 2000, Healy sent a letter to LT that expressly recognized that the TTO, in the 2001 fiscal year, would continue to operate under the parties' agreement in the same manner as in 2000: "As was done last year the Trustees will continue funding certain business functions. Funding last year totaled \$106,403.00 (which brought the district's net payment to \$59,073.00)."

28. On January 12, 2001 – four months after writing to affirm the agreement for the 2001 fiscal year – Healy sent LT a letter detailing the duties and responsibilities of the TTO. Healy specifically noted that "105 ILCS 5/8-4 requires that all school districts pay there [sic] proportionate share of the expenses of the Treasurer's Office. The contribution formula is prescribed by statute and allows for no variation."

29. Until 2013, the TTO viewed the agreement on the payment of LT's business functions as fully consistent with LT's obligations to pay its pro rata share of expenses under School Code Section 8-4.

30. Each year from 2001 through 2012, the TTO and LT followed the same procedure to reaffirm their agreement on the TTO's payment of the costs of LT's business functions: Healy sent LT a written invoice under Section 8-4 for LT's pro rata share of the TTO's expenditures; LT sent Healy a written memorandum (all similar to the 2/29/2000 Memo, and attached as Exhibit C) detailing the exact costs of LT's business functions that LT proposed the TTO would pay; the TTO accepted the amount in LT's memorandum and any net payment it indicated; the Board of Education of LT considered and approved the TTO's pro rata invoice, LT's memorandum specifying the TTO's payment of LT's business functions, and any net payment due to the TTO; and the Board of Trustees of the TTO (several times during the year) approved the expenditures of the TTO, which included the payment of LT's business functions.

31. The parties' agreement on the TTO's payment of the costs of LT's business functions, and the parties' long course of dealing under the agreement, ended in 2013. On April 19, 2013, the TTO sent a letter to LT denying the existence of the agreement; accusing LT of violating School Code Section 8-4 in past years; and demanding payment from LT of over \$2 million.

Factual Background: Annual Audits

32. Since at least 1992 through 2012, the TTO paid for the annual audits of LT.

33. The TTO's payment for each of LT's annual audits, through its payment of the multiple invoices for each of the annual audits, was knowing and intentional.

34. Each year from 1992 through 2012, the Trustees of the TTO voted several times during each year to approve the expenditures of the TTO, which expenditures included the TTO's payments for the annual audits of LT.

35. During the period 1992 through 2012, the TTO repeatedly represented to LT – both in writing and in oral communications – that the TTO was paying the annual audit costs not just for LT, but also for the other member districts of the TTO (“the Other Districts”).

36. During the period 1992 through 2012, LT accepted as true – and had no reason to doubt – the TTO’s repeated representations that the TTO was paying the annual audit costs for LT and the Other Districts.

37. At no time from 1992 to 2012 did the TTO ever refuse to pay for the costs of LT’s annual audits, or reject an invoice relating to the work performed on LT’s annual audits.

38. During the relevant time, because the TTO was paying for the annual audits, LT let the TTO select the accounting firm to perform the annual audit for LT. That audit firm was the firm now known as Baker Tilly Virchow Krause, LLP, and its predecessor firms (“Baker Tilly”).

39. No law or principal of equity prevented the TTO from paying for the annual audits of LT.

40. No law or principal of equity prevented LT and the Other Districts from accepting the TTO’s payment for the costs of its annual audits.

41. From 1992 through 2012, LT was the largest member district in the TTO, accounting for about 25 percent of the district’s pooled investment funds.

42. By paying for the annual audits of LT from 1992 through 2012, the TTO during this time period encouraged LT to continue to remain a member of the TTO, and to not seek to depart from this archaic, unprofessional, and unnecessary organization through a legislative act, as many other school districts have done successfully in order to save their taxpayers money.

43. From 1992 through 2012, LT relied on the TTO’s payments of LT’s annual audit costs in budgeting for and allocating LT’s funds to teacher and staff salaries, educational programs,

building construction and maintenance, and other education-related responsibilities and programs in each fiscal year.

44. From 1992 through 2012, the payments that the TTO made for the annual audits of LT were part of the expenditures of the TTO. The TTO's expenditures, in turn, formed the basis of the TTO's pro rata expense invoices. During this period, LT's pro rata share was about 25 percent. Therefore, through the pro rata billing process, the TTO invoiced LT for about 25 percent of the costs of LT's own annual audit.

Factual Background: Interest Payments

45. From 1995 through 2012, the TTO held and invested the funds belonging to LT and the other school districts within the TTO's jurisdiction ("the Other Districts").

46. From 1995 through 2012, the TTO would make payments to LT and the Other Districts of funds that the TTO represented to be interest on the investments the TTO made with their pooled funds.

47. From 1995 through 2012, the TTO would make these interest payments on a periodic basis, which sometimes but not always was done quarterly.

48. From 1995 through 2012, the TTO provided LT and the Other Districts with little or no information or supporting documentation about the specific investments that the TTO made of the members' funds, the rates of return on these investments, the terms of these investments, the amount of interest that the TTO actually earned on the pooled investments, or the amount of interest that each school district was entitled to receive as its share of the investment earnings.

49. From 1995 through 2012, the TTO never provided LT with sufficient information or documentation to allow LT to calculate the amount of interest on investments it was entitled to receive from the TTO.

50. From 1995 through 2012, the TTO never provided LT with sufficient information or documentation to allow LT to confirm that the amount of the interest earnings that it received from the TTO was correct.

51. From 1992 through 2012, LT relied on the TTO's representations on the amounts of interest on investments due to LT in budgeting for and allocating LT's funds to teacher and staff salaries, educational programs, building construction and maintenance, and other education-related responsibilities and programs in each fiscal year.

First Affirmative Defense – Laches

52. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

53. This case presents extraordinary circumstances showing that the TTO unreasonably delayed in pursuing its claims in this case.

54. These extraordinary circumstances include (a) entering into an agreement in 2000 with LT for the payment of LT's annual business functions, reaffirming that agreement every year from 2001 through 2012 with the approval of both boards, knowingly and intentionally accepting the agreed setoff against the pro rata invoice, and then – in 2013 – terminating the agreement and only then denying its existence or validity and seeking to recover 12 years of past payments to LT exceeding \$2 million; (b) making interest payments on investments to LT from 1995 to 2012, failing to provide LT with information or documentation sufficient to allow LT to confirm the

accuracy of the amount, failing to keep sufficient records at the TTO to document the interest earnings, and then – in 2013 – claiming that the TTO overpaid interest to LT over a 17 year period and demanding the return of over \$1.5 million; and (c) knowingly, and without coercion or duress, paying for the annual audits of LT from at least 1992 through 2012, representing repeatedly to LT that the TTO was paying for the audits of the Other Districts, selecting for LT the auditor that performed the annual audits (for LT, the TTO, and the Other Districts), and then – in 2013 – claiming that its own payments for the past 20 years to Baker Tilly were improper and seeking the return of over \$500,000.

55. During the relevant time period, LT relied on its financial arrangements with the TTO and its long course of dealings with the TTO in formulating budgets, allocating resources, and managing its public funds.

56. Under these extraordinary circumstances, the TTO's claims are barred in whole or part by the doctrine of laches.

Second Affirmative Defense – Statute of Limitations

57. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

58. The TTO's claims in the First Amended Complaint are subject to the five-year catch-all statute of limitations set forth in 735 ILCS 5/13-205.

59. The application of this statute of limitations bars those claims and alleged damages of the TTO that occurred or arose five years before the filing date of this case.

Third Affirmative Defense – Promissory Estoppel

60. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

61. Promissory estoppel is an equitable device invoked to prevent a party from being injured by a change in position made in reasonable reliance on another's conduct. This affirmative defense is pled in the alternative to LT's positions in this case and the facts contained in the record.

62. From 1992 through 2012, the TTO agreed with LT to pay the TTO's chosen auditor Baker Tilly for the costs of LT's annual audit. The parties reaffirmed that agreement several times during each of these years as Baker Tilly sent periodic invoices to the TTO (or LT forwarded the invoices to the TTO), and the TTO paid them. Nevertheless, the TTO now claims in this case that this agreement did not exist, and/or that it was not legally enforceable.

63. In correspondence and communications between the TTO and LT that occurred over many years, the TTO repeatedly and unambiguously promised LT that it would pay for LT's annual audits, and in fact did so.

64. LT reasonably relied on the promises that the TTO made with respect to the annual audits payments, and LT also relied on the TTO's annual audit payments themselves.

65. LT's reliance on the TTO's promises to pay LT's annual audit costs, and the TTO's actual payments themselves, was expected and foreseeable by the TTO.

66. During the relevant years, LT relied on TTO's promises to pay for LT's annual audit costs to its detriment – if the TTO actually is able to avoid this agreement and reverse the parties' 20 year course of dealing. This detriment was based on the annual budgeting that LT conducted over the last 20 years; its deferral of efforts to remove itself from the archaic, corrupt, and unnecessary TTO system; its continued use of the audit firm that the TTO selected for the use

of LT; and the disruption to LT's educational mission and its teachers, students, parents, and taxpayers that will result from the reversal of 20 years' worth of payments that exceed \$500,000.

67. In 2000, the TTO and LT reached an agreement in which the TTO agreed to pay for the costs of LT's business functions. The parties reaffirmed their agreement each year from 2001 through 2012. By this agreement, the TTO accepted LT's payment of the pro rata invoice with an offset for the TTO's payment for LT's business functions. Nevertheless, the TTO now claims in this case that this agreement did not exist, and/or that it was not legally enforceable.

68. In correspondence and communications between the TTO and LT from 1999 through 2012, the TTO repeatedly and unambiguously promised LT that it would pay for LT's business functions, and in fact did so.

69. LT reasonably relied on the promises that the TTO made with respect to the business functions payments, and LT also relied on the annual offsets for the business function payments themselves.

70. LT's reliance on the TTO's promises to pay for LT's business functions, and the annual offsets for the business function payments themselves, was expected and foreseeable by the TTO.

71. During the relevant years, LT relied on TTO's promises to pay for LT's business functions to its detriment – if the TTO actually is able to avoid this agreement and reverse the parties' 12 year course of dealing. This detriment was based on the annual budgeting that LT conducted over the last 20 years; its deferral of efforts to remove itself from the archaic, corrupt, and unnecessary TTO system; its hiring, retention, and payment of the salaries and benefits of the many employees who performed LT's business functions during the relevant years; its decision not to use the business services of the TTO in light of the TTO's agreement with LT; and the

disruption to LT's educational mission and its teachers, students, parents, and taxpayers that will result from the reversal of 12 years' worth of offsets exceeding \$2 million.

72. Accordingly, the TTO's claims are barred in part by the doctrine of promissory estoppel.

Fourth Affirmative Defense – Equitable Estoppel

73. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

74. Equitable estoppel is a doctrine that is invoked to prevent fraud and injustice. It arises whenever a party, by its word or conduct, reasonably induces another to rely on its representations, leading the other party to change its position so as to be injured. This affirmative defense is pled in the alternative to LT's positions in this case and the facts contained in the record.

75. From 1992 through 2012, the TTO agreed with LT to pay its chosen auditor Baker Tilly for the costs of LT's annual audit. The parties reaffirmed that agreement several times during each of these years as Baker Tilly sent periodic invoices to the TTO (or LT forwarded the invoices to the TTO), and the TTO paid them. Nevertheless, the TTO now claims in this case that this agreement did not exist, and/or that it was not legally enforceable.

76. In 2000, the TTO and LT reached an agreement in which the TTO agreed to pay for the costs of LT's business functions. The parties reaffirmed their agreement each year from 2001 through 2012. By this agreement, the TTO accepted LT's payment of the pro rata invoice with an offset for the TTO's payment for LT's business functions. Nevertheless, the TTO now claims in this case that this agreement did not exist, and/or that it was not legally enforceable.

77. In this case, the TTO made periodic payments to LT for interest on investments, and represented to LT with each payment that the amount was correct and proper – while not supplying LT with documentation and information sufficient for LT to verify the amounts of the payments.

78. The TTO, as detailed above, engaged in a pattern of conduct and communications over 20 years that (based on the TTO's current claims and positions taken in this case, and not necessarily on LT's positions or the factual record in this case) amounted to misrepresentation or concealments of material facts – namely, that the TTO would not abide by its agreement with LT to pay the annual audit costs; that the TTO did not have the ability to agree to pay for the annual audit costs of LT; that the TTO did not pay for the annual audits of the other districts; that the TTO could or would deny the existence of this agreement and seek to recover these payments many years later; that the TTO would not abide by its agreement to pay for LT's business functions; that the Board of Trustees of the TTO in 2000 did not accept the proposal of LT on the payment of LT's business functions, and did not approve the expenditures of the TTO that included those payments during each subsequent year from 2001 to 2012; that the TTO was not willing to accept LT's annual offset for the cost of its business functions against the annual pro rata expenses invoice; that the payment of LT's annual audits costs and costs of business functions were illusory and misleading incentives for LT to remain in the TTO's jurisdiction; that the TTO did not maintain complete and proper records of its investment income; that the TTO did not pay the investment income to LT and the other districts as required; and that the TTO made incorrect and arbitrary payments paid to LT and other districts.

79. Under the circumstances alleged above, the TTO had at least implied knowledge of these actions and communications amounting to misrepresentations and concealments, and

intended that LT would act on these misrepresentations and concealments. LT had no knowledge of the true facts (as the TTO now alleges them to be) and was innocent in its dealings with the TTO.

80. LT reasonably and in good faith changed its position and relied on the TTO's misrepresentations and concealments to its detriment, in that LT relied on the TTO's conduct and statements with respect to the annual audit costs, costs of business functions, and interest payments for investments in its preparation of annual budgets over the last 20 years; its deferral of efforts to remove itself from the archaic, corrupt, and unnecessary TTO system; its hiring, retention, and payment of the salaries and benefits of the many employees who performed LT's business functions during the relevant years; its decision not to use the business services of the TTO in light of the TTO's agreement with LT; its continued use of the audit firm that the TTO selected for the use of LT and the Other Districts; its decisions not to pursue more aggressively its repeated requests for reasonable information and documentation of the TTO's statements and calculations about LT's investments, its earnings on those investments, and the payments of interest to LT by the TTO; and the disruption to LT's educational mission and its teachers, students, parents, and taxpayers that will result from the reversal of 12 years' worth of offsets for LT's business functions exceeding \$2 million, 20 years of audit cost payments exceeding \$500,000, and 17 years of interest payments involving alleged overpayments of interest exceeding \$1.5 million.

81. Under the circumstances of this case, conscience and honest dealing require that the TTO be equitably estopped from pursuing all or some of its claims in this case.

Fifth Affirmative Defense – Waiver

82. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

83. The affirmative defense of waiver is based on a party's express or implied voluntary and intentional relinquishment of a known and existing right. This affirmative defense is pled in the alternative to LT's positions in this case and the facts contained in the record.

84. From 2000 to 2012, the TTO had a statutory right to send invoices to LT seeking payment of LT's pro rata share of the TTO's expenditures authorized by statute, and to collect on those invoices.

85. From 2000 to 2012, LT never refused to pay its pro rata share of the TTO's annual expenditures. In each year, the Board of Education of LT received and approved the TTO's annual pro rata invoice through its approval of the consent agenda at Board meetings.

86. From 2000 to 2012, in accordance with LT's agreement with the TTO on the payment of LT's business expenses, LT annually offset against the annual pro rata expense payment the annual cost of its business functions, and informed the TTO in writing of the amount of the offset.

87. To the extent that the TTO alleges that it had a legal right to receive LT's pro rata expense payments separate from the offsets for the costs of LT's business functions, and to the extent that the offsets were in any way improper or illegal, the TTO knowingly, and without coercion or duress, relinquished this right through its course of dealings and communications conducted with LT over a 12 year period.

88. Accordingly, at least part of the TTO's claims in this case are barred by the doctrine of waiver.

Sixth Affirmative Defense – Unclean Hands

89. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

90. In the First Amended Complaint, the TTO fails to provide any legal theory of recovery to support its claims for declaratory relief and an award of over \$4 million in compensatory damages.

91. Nevertheless, it appears from the First Amended Complaint that the TTO is seeking equitable relief from this Court.

92. The TTO intentionally engaged in bad faith conduct toward LT starting in 2013. This bad faith conduct includes the TTO denying the existence of the long-standing agreement on payment of LT's business expenses; the TTO's current claim that an intergovernmental agreement was required, despite its representations to LT to the contrary in 1999; the TTO's claims about the calculations of interest on investments that were made without regard for the absence of sufficient records at the TTO to support valid calculations of interest due; and the TTO's claims made about the payments for the annual audits of LT in spite of the intentional nature of these payments, the lack of any legal bar to these payments, and the TTO's repeated representations to LT that it made these payments for the Other Districts.

93. Due to this bad faith conduct, the TTO's claims in this case are barred in whole or part by the doctrine of unclean hands.

Seventh Affirmative Defense – Unjust Enrichment

94. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

95. In 2000, the TTO and LT reached an agreement in which the TTO agreed to pay for the costs of LT's business functions. The parties reaffirmed their agreement each year from 2001 through 2012. By this agreement, the TTO accepted LT's payment of the pro rata invoice with an offset for the TTO's payment for LT's business functions. Nevertheless, the TTO now claims in this case that this agreement did not exist, and/or that it was not legally enforceable.

96. This affirmative defense is pled in the alternative to LT's positions in this case and the facts contained in the record.

97. The TTO represented to LT that it was willing to enter into the agreement with LT concerning the payment for LT's business functions because if LT personnel did not perform those functions, the TTO would have to provide its own personnel at the TTO's expense to perform those functions.

98. Accordingly, in the event that the TTO's agreement with LT on paying the costs of LT's business functions is unenforceable or illegal, the TTO retained the benefit of the performance of LT's business functions without paying LT for that benefit. The TTO's retention of the benefits of these services would be to the detriment of LT, which paid for the salaries and benefits of employees that the TTO otherwise would have had to pay itself.

99. The TTO's retention of the benefit of these services is unjustified, given that the TTO had a statutory obligation to perform these services and chose to outsource these services to LT – with the promise of fair compensation for these services in an amount to be agreed on in each year.

100. The fair value of these business services is set forth in the annual memoranda that LT sent to the TTO from 2000 through 2012 (attached as Exhibit C).

101. Because the TTO's retention of the value of LT's performance of business services without payment would violate fundamental principles of justice, equity, and good-conscience, the TTO's claims are barred in part by the doctrine of unjust enrichment.

Eighth Affirmative Defense – Quantum Meruit

102. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

103. In 2000, the TTO and LT reached an agreement in which the TTO agreed to pay for the costs of LT's business functions. The parties reaffirmed their agreement each year from 2001 through 2012. By this agreement, the TTO accepted LT's payment of the pro rata invoice with an offset for the TTO's payment for LT's business functions. Nevertheless, the TTO now claims in this case that this agreement did not exist, and/or that it was not legally enforceable.

104. This affirmative defense is pled in the alternative to LT's positions in this case and the facts contained in the record.

105. From 2000 to 2012, LT provided business services to the TTO by having its personnel perform the accounts payable, payroll, and reconciliation work that the TTO was statutorily obligated to perform for LT.

106. LT did not perform these business services gratuitously, and instead performed them under the promise of compensation from the TTO.

107. The TTO received an annual statement of the nature and the cost of the business services from LT, which the TTO received and approved.

108. The TTO accepted the business services that LT's personnel provided and used the information generated from these services.

109. In the event that the TTO is able to reverse its 12 year history of promises to pay and of acceptance of offsets for these services, LT would be uncompensated for the value of these services.

110. The fair value of these services is set forth in the annual memoranda that LT sent to the TTO from 2000-12 (Exhibit C).

111. Accordingly, the TTO's claims in this case are barred in part by the doctrine of quantum meruit.

Ninth Affirmative Defense – Voluntary Payment Doctrine

112. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses as set forth above.

113. In accordance with the voluntary payment doctrine, money voluntarily paid under a claim of right to the payment, and with knowledge of the facts by the person making the payment, cannot be recovered by the payor solely because the claim was illegal. Absent fraud, coercion, or mistake of fact, monies paid under a claim of right to payment but under a mistake of law are not recoverable.

114. During the period 2000 to 2012, LT annually submitted to the TTO a claim for reimbursement for the costs of LT's business functions. Those annual claims included a detailed description of the employees who performed the business functions, their salaries and benefits, and any ancillary expenses. With full knowledge of the relevant facts, the TTO each year during that period made payment on LT's claims by agreeing to offset the costs of LT's business functions against LT's annual pro rata expense invoices, and by its acceptance of any net payments that LT made to the TTO.

115. There was no fraud, coercion, or mistake of fact involved in the TTO's decisions to pay for the costs of LT's business functions.

116. During the period 1992 through 2012, LT made claims for payment several times a year in form of invoices that either LT or Baker Tilly submitted to the TTO for work on LT's annual audit. Those periodic claims included a description of the work that Baker Tilly performed, and the fact that the work was for LT's annual audit. With full knowledge of the relevant facts, the TTO several times a year during that period made payment on LT's claims by sending payment in full to Baker Tilly on the invoices.

117. There was no fraud, coercion, or mistake of fact involved in the TTO's decisions to pay for the costs of LT's annual audits.

118. During the period 1995 through 2012, LT periodically made claims for payment of interest on the funds that the TTO held and invested for the benefit of LT. These periodic claims came in the form of discussions concerning the nature and sufficiency of the investments, requests for more information about the investments, and – according to the allegations of the TTO in this case, which LT expressly denies as false – alleged requests of LT for payments of interest beyond the amounts that LT was entitled to receive. With full knowledge of the relevant facts, the TTO several times a year during that period made payment on LT's claims by paying interest to LT's funds through journal entries made at the TTO that increased the balances of LT's funds.

119. There was no fraud, coercion, or mistake of fact involved in the TTO's decisions to pay to LT periodic interest on invested funds.

120. Accordingly, the TTO's claims are barred in whole or part by the voluntary payment doctrine.

WHEREFORE, LT respectfully asks this Court to enter judgment in its favor and against the TTO, deny the TTO any recovery under the First Amended Complaint, and award LT its costs of suit.

Second Amended Counterclaim

1. LT is a public school district organized under the laws of the State of Illinois with a principal office located in LaGrange, Cook County, Illinois.

2. The TTO is a local public entity organized under the law of the State of Illinois with a principal office located in LaGrange, Cook County, Illinois.

3. The TTO has three elected Trustees. The Trustees select a salaried Treasurer.

4. The Treasurer manages the TTO's office, supervises its support staff, and interfaces with the school districts that are members of the TTO.

5. LT is a member district of the TTO. LT's membership in the TTO is mandated by state statute.

6. The TTO holds the funds (received through taxes and other sources) belonging to LT and the other member school districts ("the Other Districts"). The TTO pools the funds of the member districts together and invests those funds on behalf of LT and the Other Districts.

7. During all relevant times through about August 2012, Robert Healy served as Treasurer of the TTO.

Count I: Setoff

8. LT incorporates by reference the allegations in paragraphs 1-51 of the Affirmative Defenses and paragraphs 1-7 of the Counterclaim as set forth above.

9. In the First Amended Complaint, the TTO contends that LT did not pay in full the invoices that the TTO sent LT from 2000 to 2012 for LT's pro rata share of the TTO's expenses. Implicit in the First Amended Complaint is a refusal to acknowledge that the TTO and LT agreed in 2000, and reaffirmed in each subsequent year through 2012, that the TTO would pay the costs of LT's business functions and offset those costs against the pro rata invoices.

10. In its other pleadings in this case, the TTO has claimed that the parties' agreement on the payment of LT's business functions is illegal and unenforceable.

11. The TTO's position on this agreement is wrong. As detailed above, in 2000, the TTO and LT knowingly entered into a valid and binding written agreement, approved by both boards, in which the TTO agreed to pay the costs of LT's business expenses as set forth in the 2/29/2000 Memo (Exhibit B).

12. In each subsequent year from 2001 to 2012, the TTO and LT reaffirmed this agreement when LT presented the TTO with a written statement of the annual costs that it proposed the TTO would pay (Exhibit C). In each of those years, the TTO accepted those amounts, as well as LT's offset of those amounts against the annual pro rata expense invoice that the TTO provided to LT. The boards of both parties provided their consents to this arrangement.

13. In 2013, the TTO terminated this arrangement. LT does not contest the TTO's right to terminate in 2013 for 2013 fiscal year. LT does not assert any claims or seek any damages relating to the TTO's 2013 termination.

14. Under the circumstances of this case, LT is entitled to a setoff, in the amounts set forth in the memoranda attached as Exhibit A, which cover the years 2000 through 2012, against any claim of the TTO relating to the alleged non-payment of the TTO's pro rata expense invoices from 2000 to 2012.

15. In asserting this claim for setoff, LT does not seek any affirmative recovery of damages against the TTO.

WHEREFORE, LT respectfully asks this Court to enter judgment in favor of LT and against the TTO on Count I, and award LT its costs of suit.

Count II: Breach of Fiduciary Duty

16. LT incorporates by reference the allegations in paragraphs 1-7 of the Counterclaim as set forth above.

17. During the relevant period, in accordance with state law requirements, the TTO purchased fidelity bonds that applied to Healy's service as Treasurer ("the Bonds").

18. Liberty Mutual Insurance Company and The Hanover Insurance Company (a/k/a Massachusetts Bay Insurance Company) issued the Bonds to the TTO.

19. Through their pro rata share payments of the TTO's expenditures, LT and the Other Districts paid the premiums on the Bonds.

20. After Healy resigned from the TTO in 2012, the TTO learned that Healy had stolen more than \$1 million through wrongful wire transfers of funds from the TTO's bank and through wrongful payments for sick and vacation days. This money that Healy stole was money that the TTO held in trust for LT and the Other Districts.

21. In 2013, the State of Illinois charged Healy with the crime of Theft in Excess of \$1 million, a Class X felony. Healy pled guilty and received a sentence of nine years in prison.

22. The TTO made claims on the Bonds. The TTO's claims alleged that Healy had stolen more than in excess of \$1 million through wrongful wire transfers of funds from TTO's bank and through wrongful payments for sick and vacation days.

23. The TTO recovered \$1,040,000 on its claims on the Bonds.

24. In an affidavit filed in this case and dated June 5, 2015, the current Treasurer of the TTO, Dr. Susan Birkenmaier, claimed that \$1,040,000 in recoveries on the Bonds “has been set aside while Township Trustees continue their efforts to recover additional sums.” Birkenmaier further claimed that the TTO can apply the \$1,040,000 recovery “to pay unrelated expenses of the Treasurer’s office”; that the TTO can “otherwise” use the money in an unspecified manner “in accordance with Illinois law”; and that the TTO has no obligation to allocate the recoveries on the Bonds amongst its member districts.

25. Since June 5, 2015, the TTO has not distributed to LT any of the recoveries on the Bonds, or explained why it has not made this distribution to LT.

26. The TTO serves as the fiscal agent of LT and the Other Districts with respect to its possession and investment of the funds of LT and the Other Districts, and as such, owes fiduciary duties to LT.

27. Among the purposes of the Bonds was to protect LT and the Other Districts from losing money as a result of theft by the Treasurer of the TTO.

28. The \$1,040,000 in recoveries on the Bonds is money that rightly belongs to LT and the Other Districts, and that must be used to compensate LT and the Other Districts for Healy’s theft of their funds.

29. LT’s share of the \$1,040,000 recoveries on the Bonds is determined by its pro rata ownership of the pooled investment fund at the time of the recoveries, which was approximately 25 percent.

30. Despite LT’s repeated demands to the TTO for payment of LT’s share of the recoveries on the Bonds, the TTO still has refused to make payment.

31. The TTO has no legal right, as the fiduciary agent of LT, to take LT's share of the recoveries on the Bonds and spend that money on expenses unrelated to the misconduct of Healy that gave rise to the claims on the Bonds.

32. The TTO's refusal to pay to LT its share of the recoveries on the Bonds is a breach of the TTO's fiduciary duties owed to LT. This breach directly and proximately caused injury to LT in the form of lost funds of about \$250,000.

WHEREFORE, LT respectfully asks this Court to enter judgment in favor of LT and against the TTO on Count II; award LT compensatory damages in the amount of LT's rightful share of the \$1,040,000 payments on the Bonds; and award LT its costs of suit.

Respectfully submitted,

LYONS TOWNSHIP HIGH SCHOOL
DISTRICT 204

By s/Jay R. Hoffman
Its Attorney

Jay R. Hoffman
Hoffman Legal
20 N. Clark St., Suite 2500
Chicago, IL 60602
(312) 899-0899
jay@hoffmanlegal.com
Attorney No. 34710

EDUCATION IS EVERYONE'S RESPONSIBILITY

Township Trustees of Schools

TOWNSHIP 38 NORTH, RANGE 12 EAST

P.O. BOX #1246
830 BARNSDALE ROAD
LA GRANGE PARK, ILLINOIS 60526-9346

BOARD OF SCHOOL TRUSTEES
Joseph Nekola, President
Donna A. Millich, Trustee
Russell W. Hartigan, Trustee

ROBERT G. HEALY
TOWNSHIP SCHOOL TREASURER
Telephone: Area 708-352-4480
Fax: 708-352-4417

August 18, 1999

Dr. Lisa Beckwith
Business Manager
Lyons Township High School District #204
100 S. Brainard Avenue
LaGrange, IL 60525

RE: Pro-Rata Billing System

Dear Dr. Beckwith:

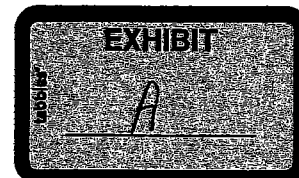
In response to our most recent discussion regarding the possibility of instituting certain measures to balance the efforts of our respective staffs, I would like to elaborate on the issue as explained to me by you and the Board of Education and some proposed possible solutions.

1. *Proposal - Deviation from Pro-Rata Billing.*

Bluntly put, it is my understanding that the Board's concern is that High School District #204's proportionate share of the Township Treasurer's expenses, as mandated by School Code, is too large when compared to the services District 204 receives from the Treasurer's office.

One proposal that emanated from the Board to reduce District 204's expenses is to draft an Intergovernmental Agreement among all twelve taxing bodies in the Township, wherein the other eleven taxing bodies would agree to absorb the costs of the services District 204 claims it pays for but does not receive.

Simply put, it is highly unlikely that the Boards of those other eleven taxing bodies would ever agree to absorb those claimed costs to save District 204 money. We must keep in mind that the other taxing entities are currently utilizing all of the available services of the Township Treasurer's office.



D204-00169

Dr. Lisa Beckwith
August 18, 1999
Page 2

2. *Proposal - Funding by Township School Treasurer of Some District Functions.*

If the responsibilities for the Accounts Payable and Payroll production were to be returned to the School Treasurer's office it would mean higher operating costs for the Treasurer's office in the form of salaries and benefits for increased staff and higher related expenses to accommodate the increase in work load.

I would expect that when the Trustees of Schools takes into consideration these necessary increases, they would logically conclude that a partial funding by the Treasurer's office to cover District 204's costs for the business functions District 204 now performs would be reasonable. Especially in light of the fact that the Treasurer's office is currently performing the same business functions for the eleven other school districts.

3. *Proposal - Treasurer's Office to Assume Additional Duties.*

You and I have discussed at previous meetings the possibility that the Treasurer's office would start performing tasks not currently done for District 204. For example, the reconciliation of District 204's books to the Treasurer's ledger. My office has already assumed a significant part of this function because I feel it is imperative that the requirement be performed in a timely fashion.

4. *Proposal - Legislative Action to Change Pro-Rata Billing System.*

The Finance Committee of the Board has suggested the possibility that the Pro-Rata billing system currently in effect throughout Cook County be changed through legislative action. This is a complicated process requiring the introduction of the proposed bill and the cooperation of both houses and the governor. You understand as well as I the likelihood of success of any bill. Keep in mind that this billing process is in use throughout the other townships in Cook County and has been for a very long time.

5. *Proposal - Use of District 204's Computer by the Treasurer's Office.*

There are a number of significant obstacles to this proposal.

The Treasurer's office would have to locate its hardware near District's 204's hardware. This would necessitate moving the Treasurer's office close to District 204. Back ups, communication problems and our "Catastrophe Plan" all require that Treasurer's office personnel be working at the location where the system is run.

Such a move would require the re-location of all communication's equipment, phone lines and high speed data lines currently in use. I cannot adequately estimate the tens if not

Dr. Lisa Beckwith
August 18, 1999
Page 3

hundreds of thousands of dollars it would cost to relocate the office and all its hardware and systems.

In addition, if the Treasurer's office were to use District 204's computer system it would require that the software used now for all the business tasks of all the other districts would have to be scrapped and their software programs converted to that of District 204. Also, approximately two hundred and fifty users from the various districts would have to undergo costly re-training and the Districts would have to purchase expensive additional software and probably hardware to make the change to your system. Invariably, the change would lead to the inevitable growing pains that would negatively affect the ongoing operations of the other districts.

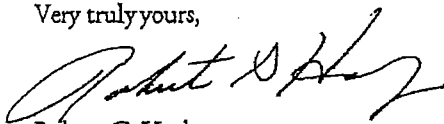
It is important to note that my computer programmer has informed me that the software the Treasurer's office is currently using cannot be run on the AS400 computer.

All of the problems would have to be faced, solved and paid for by the Treasurer's office. The other eleven districts seem to be eminently satisfied with the current operation and services they are receiving from the Treasurer's office.

Given all of these issues, it is hard to see what advantage a changeover would be to the operation of the Treasurer's office and the thirteen other districts I serve.

I look forward to meeting with you at your convenience to further discuss these proposals.

Very truly yours,



Robert G. Healy
Lyons Township School Treasurer

RGH/grm

CC: Lyons Township Trustees of Schools

Memorandum

To: Robert Healy

From: Lisa Beckwith

Date: February 29, 2000

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- Annual salary and benefit costs for 3 employees as listed below:

	Salary	OASDI		Insurance	Insurance	
	<u>99-00</u>	<u>Medicare</u>	<u>IMRF</u>	<u>Medical</u>	<u>Life</u>	<u>Total</u>
Programmer Analyst	\$41,205	\$3,152	\$3,045		\$48	\$47,450
Accounts Payable Bkkeeper	\$23,192	\$1,774	\$1,714	\$7,028	\$48	\$33,756
Payroll Bookkeeper	\$21,861	\$1,672	\$1,616		\$48	\$25,197
Total	\$86,258	\$6,598	\$6,375	\$7,028	\$144	\$106,403

An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the fiscal year.



Memorandum

To: Robert Healy

From: Lisa Beckwith

Date: February 29, 2000

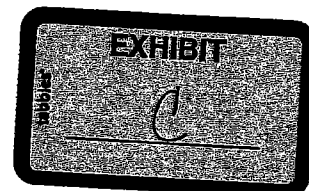
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Total	\$86,258	\$6,598	\$6,375	\$7,028	\$144	\$106,403

An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the fiscal year.



D204-00176

POSITION TITLE: Programmer/Analyst
DEPARTMENT: Computer Services
REPORTS TO: Director of Computer Services

SUMMARY: Responsible for development and support of computer applications including reports, job processing cycles and distribution of system over district network.

ESSENTIAL DUTIES AND RESPONSIBILITIES: (other duties may be assigned)

- Develops and maintains reports as needed from district database.
- Implements systems applications and enhancements.
- Establishes processing cycles and controls, and monitors regularly.
- Updates and maintains all systems database.
- Responsible for production processing of finance daily, as well as budget build, fiscal year end, fiscal year set-up.
- Responsible for production processing of human resources, payroll, including scheduled payrolls, fiscal year end, fiscal year set-up, calendar year end and professional register.
- Determines needs of users; assists in designing systems to be programmed.
- Revises existing programs to reflect changes in system; writes program documentation or revises existing documentation; designs new screens.
- Answers technical questions from users; modifies job controls to accommodate non-routine or new run requests.
- Performs related work as required.

SUPERVISORY RESPONSIBILITIES: Office personnel in absence of Director of Computer Services.

QUALIFICATION REQUIREMENTS: *To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.*

EDUCATION AND/OR EXPERIENCE: A minimum of two-year college degree with major course work in computer science. One year of working experience helpful.

LANGUAGE SKILLS: Ability to read, analyze and interpret general business periodicals, professional journals, technical procedures or governmental regulations. Ability to write reports and procedure manuals. Ability to effectively present information and respond to questions from groups of administrators and staff.

MATHEMATICAL SKILLS: Ability to work with mathematical concepts such as probability and statistical inference. Ability to apply concepts such as fractions, percentages, ratios, and proportions to practical situations.

POSITION TITLE
DEPARTMENT
REPORTS TO.

Senior Accounts Payable Clerk
Business Services
Purchasing/Accounting Manager

SUMMARY: Processes Accounts Payable and maintains associated vendor and invoice files for the District.

ESSENTIAL DUTIES AND RESPONSIBILITIES: (other duties may be assigned)

- Reviews, processes and pays all authorized invoices. Ensures timely entry of data to automated system.
- Maintains vendor file including vendor numbers and responds to vendor inquiry regarding payment.
- Maintains files of paid and unpaid invoices and purchase orders.
- Assists with annual audit.
- Prepares verifies and distributes checks; files copies.
- Prepares information in response to ad hoc requests for payment histories.
- Assists with annual Student Processing/Registration.
- Performs clerical duties such as typing, photocopying and distributing mail.
- Responds to telephone inquiries, supplies information to callers, and records messages.
- Processes and disperses all District Purchase Orders.
- Phones in repairs for business machines.
- Back-up for Accounts Payable Clerk.

SUPERVISORY RESPONSIBILITIES: None

QUALIFICATION REQUIREMENTS: *To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.*

EDUCATION AND/OR EXPERIENCE: High School Graduate or equivalent. Knowledge of accounting/bookkeeping procedures helpful.

LANGUAGE SKILLS: Ability to read and interpret documents such as safety rules and operating and maintenance instructions; ability to write routine reports and correspondence; and ability to speak effectively with vendors, administrators and staff.

MATHEMATICAL SKILLS: Ability to calculate figures and amounts such as discounts, interest, commissions, proportions, and percentages.

REASONING ABILITY: Ability to apply common sense understanding to carry out instructions furnished in written or oral form. Ability to deal with problems involving several concrete variables in standardized situations.

OTHER SKILLS AND ABILITIES: Personal Computer and Mainframe spreadsheet experience. Technical skills to program/repair telecommunications. Ability to perform duties with awareness of all District requirements and Board of Education policies.

POSITION TITLE: Payroll Bookkeeper
DEPARTMENT: Business Services
REPORTS TO: Purchasing/Accounting Manager

SUMMARY: Works independently while providing accurate and systematic payroll services.

ESSENTIAL DUTIES AND RESPONSIBILITIES: (other duties may be assigned)

- Processes payroll data for all school district employees and maintains accurate, up-to-date files of all payroll information.
- Computes deductions, hours worked, rate, and totals for balancing.
- Prepares, verifies, and distributes checks.
- Prepares and controls the electronic transfers of payroll checks.
- Distributes payroll deductions in compliance with local, State and Federal statutes.
- Prepares required governmental reports: IMRF and TRS retirement, IRS, W-2, etc.
- Balance District Financial statement as it relates to Payroll, IMRF, FICA, and Medicare. This information is presented to the Board of Education monthly and is used to balance the District finances with the Township Treasurer.
- Prepares special statistical reports on payroll costs for use in budgeting and personnel.
- Processes mortgage verifications and final salary affidavits.
- Distributes payroll deductions to numerous annuity companies, credit union and Flex Spending Account.
- Answers telephone and directs inquiries from employees and vendors.

SUPERVISORY RESPONSIBILITIES: None

QUALIFICATION REQUIREMENTS: *To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.*

EDUCATION AND/OR EXPERIENCE: High School Graduate or equivalent. Knowledge of accounting/bookkeeping experience necessary; payroll experience helpful.

LANGUAGE SKILLS: Ability to read and interpret documents; ability to write routine reports and correspondence; and ability to speak effectively with vendors, administrators and staff.

MATHEMATICAL SKILLS: Ability to calculate figures and amounts such as commissions, proportions, and percentages.

REASONING ABILITY: Ability to apply common sense understanding to carry out instructions furnished in written or oral form. Ability to deal with problems involving several concrete variables in standardized situations.

Memorandum

To: Robert Healy

From: Harold Huang

Date: May 30, 2001

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- Annual salary and benefit costs for 3 employees as listed below:

	Salary	OASDI		Insurance	Insurance	
	00-01	Medicare	IMRF	Medical	Life	Total
Programmer Analyst	\$43,265	\$3,310	\$2,328		\$48	\$48,903
Accounts Payable Bkkeeper	\$29,431	\$2,252	\$1,583	\$7,650	\$48	\$40,916
Payroll Bookkeeper	\$34,000	\$2,601	\$1,829	\$4,896	\$48	\$43,326
Total	\$106,696	\$8,163	\$5,740	\$12,546	\$144	\$133,289

An invoice will be sent to the Township Treasurer in May with receipt of funds expected prior to the close of the fiscal year.

INVOICE 7890

LADWIG BUSINESS FORMS, INC.

1030 S. LaGrange Road

Suites 6 and 7

LaGRANGE, ILLINOIS 60525

(708) 352-2070

FAX: (708) 352-2086

INVOICE DATE December 12, 2000

CUSTOMER ORDER NO. 032897

SOLD TO:

SHIP TO:

Attn: Business Office

Same

Lyons Township High School

Attn: Ilona/Room 108

100 S. Brainard Avenue

LaGrange, IL 60525

[illegible]

Thank You

DELIVERY

PARTIAL

X COMPLETE

WE ARE NOT SUBJECT TO FEDERAL OR STATE RETAIL TAX

ALL DELIVERY CHARGES MUST BE PREPAID

••FOR BUDGET PURPOSES ONLY••
INVOICE AT CURRENT
SCHOOL DISCOUNTED PRICES

ADDITIONS:

1. THIS ORDER NUMBER MUST APPEAR ON ALL INVOICES AND SHIPMENTS TO AVOID DELAY IN PAYMENT.
2. BILL TO LYONS TOWNSHIP HIGH SCHOOL, 100 S. BRAINARD, LA GRANGE, IL 60525-2100
3. SEND ALL INVOICES TO THE ATTENTION OF THE BUSINESS OFFICE; DO NOT SEND INVOICES TO DEPARTMENTAL OFFICES OR PERSONNEL.
4. INVOICES SUBJECT TO YOUR USUAL DISCOUNT IF PRESENTED AT THE FIRST MEETING OF THE BOARD OF EDUCATION FOLLOWING RECEIPT OF INVOICE.
5. DO NOT OVERSHIP OR SUBSTITUTE WITHOUT PRIOR PURCHASING DEPARTMENT APPROVAL.

AB-22-0291

ALPHABETICAL

INVOICE 8074

LADWIG BUSINESS FORMS, INC.

1030 S. LaGrange Road
Suites 6 and 7
LaGRANGE, ILLINOIS 60525
(708) 352-2070
FAX: (708) 352-2086

INVOICE DATE May 25, 2001

CUSTOMER ORDER NO. 1261

01 MAY 30 AM 7:30

SOLD TO:

SHIP TO:

Attn: Business Office

Same

Lyons Township High School

Attn: Stockroom

100 S. Brainard Avenue

LaGrange, IL 60525

[illegible]

Thank You

TERMS: NET 15 DAYS

DELIVERY

 PARTIAL X COMPLETE

Additional Comments:

NOT SUBJECT TO FEDERAL/STATE RETAIL TAX.
SEND ALL INVOICES TO THE ATTENTION OF
THE BUSINESS OFFICE.

Instructions to Vendor:

1. Do not send invoices to the departmental offices or personnel. Payment terms are net 45 days.
2. The Purchase Order Number must appear on all invoices and shipments to avoid delay in payment.

No substitutions of any items or any alterations allowed without prior approval of Business Manager/Purchasing Manager.

We are exempt from Illinois Sales & Use Tax and Federal Excise Tax.

6. This contract is subject to and governed by the rules and regulations of the Illinois Fair Employment Practices Act, the Equal Employment Opportunity Clause, the Illinois Human Rights Act and Illinois Human Rights Commission's Rules and Regulations for public contracts.

7. Materials furnished under this order which contain substances listed under Section 205, Table A, Toxic Substances Disclosure to Employees' List (56 Illinois Administrative Code, Chapter 1, Sec. 205, Tab. A, Sub-Chapter b) shall obligate the supplier thereof to furnish a Material Safety Data Sheet (MSDS) pertinent to the product(s).

White: Vendor Pink: Business Office Green and Blue: Requisitioner Yellow: Receiving

Memorandum

To: Robert Healy

From: Harold Huang *HH*

Date: February 4, 2002

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost and responsibility of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- Annual salary and benefit costs for 3 employees as listed below:

	Salary	OASDI		Insurance	Insurance	
	<u>01-02</u>	<u>Medicare</u>	<u>IMRF</u>	<u>Medical</u>	<u>Life</u>	<u>Total</u>
Programmer Analyst	\$43,000	\$3,290	\$2,124	\$2,836	\$152	\$51,402
Accounts Payable Bkkeeper	\$30,618	\$2,342	\$1,454	\$7,946	\$51	\$42,411
Payroll Bookkeeper	\$34,908	\$2,670	\$1,571	\$5,386	\$51	\$44,586
Total	\$108,526	\$8,302	\$5,149	\$16,168	\$254	\$138,399

An invoice will be sent to the Township Treasurer in February with receipt of funds expected prior to the close of the fiscal year.

Memorandum

To: Robert Healy

From: Harold Huang

Date: March 10, 2003

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- The attached invoices were paid by LTHS. Future invoices will be sent to the Township Treasurer for payment.
- Annual salary and benefit costs for 4 employees as per attached invoice.

Receipt of funds in payment of attached invoice is expected prior to close of the fiscal year.

D204-00207

	Salary 02-03	OASDI Medicare	IMRF	TRS	Medical Insurance	Life Insurance	Total
Database Administrator (75%)	\$ 50,625	\$ 3,873	\$ 2,784		\$ 2,701	\$ 279	\$ 60,262
Accounts Payable							
Bookkeeper	\$ 31,845	\$ 2,436	\$ 1,751		\$ 9,932	\$ 55	\$ 46,020
Payroll Specialist	\$ 36,774	\$ 2,813	\$ 2,023		\$ 6,732	\$ 55	\$ 48,397
Accounts Manager (15%)	\$ 9,070			\$ 956	\$ 540	\$ 370	\$ 10,936
							\$ 165,615
Invoices paid to Ladwig Business Forms for envelopes used for payroll and accounts payable							\$ 2,939
						TOTAL	\$ 168,554

White: Vendor Pink: Business Office Green and Blue: Requisitioner Yellow: Receiving

White: Vendor Pink: Business Office Green and Blue: Requisitioner Yellow: Receiving

Memorandum

To: Robert Healy

From: Harold Young

Date: March 10, 2003

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 304 proposes become the direct cost of the Township Treasurer's Office:

1. Payroll and accounts payable bank reconciliation.
2. Balance monthly bank between Treasurer and LTFS.
3. Payroll printing costs for checks and envelopes for accounts payable, payroll, interest and student activities.
4. The attached list of employees was provided by LTFS. Future employees will be sent to the Township Treasurer for approval.
5. Annual salary and benefit costs for all employees as provided by LTFS.


Receipt of funds in payment of attached invoices is expected prior to payment of the fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2002-03

	Salary 02-03	OASD Medicare	WRF	TRS	Medical Insurance	Life Insurance	Total
PERMANENT SALARY	\$ 50,525	\$ 3,873	\$ 2,736		\$ 2,701	\$ 270	\$ 60,282
Accounts Payable	\$ 21,845	\$ 2,436	\$ 1,752		\$ 932	\$ 88	\$ 26,920
PAYROLL DEDUCTIONS	\$ 55,774	\$ 2,915	\$ 2,028		\$ 6,322	\$ 53	\$ 67,092
Accounts Payable (4.5%)	\$ 9,070			\$ 375	\$ 541	\$ 570	\$ 15,536
							\$ 155,515
PROCESSED BY TOWNSHIP BUSINESS FORMS FOR EMPLOYEES USED FOR PAYROLL AND ACCOUNTS PAYABLE							\$ 2,999
TOTAL							\$ 158,514

Memorandum

To: Robert Healy

From: David Sellers 

Date: April 12, 2004

Re: Treasurer's Office Responsibilities

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's office:

- Payroll and accounts payable bank reconciliation.
- Balance monthly totals between Treasurer and LTHS.
- Provide printing costs for checks and envelopes for accounts payable, payroll, imprest and student activities.
- Annual salary and benefit costs for 4 employees as per attached invoice.

Receipt of funds in payment of attached invoice is expected prior to close of the fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2003-04

0.2 0.3 0.100
0.2 0.3 0.100

	Salary 03-04	OASDI Medicare	IMRF	TRS	Medical Insurance	Life Insurance	Total
Database Administrator (75%)	\$ 51,638	\$ 3,950	\$ 3,305		\$ 3,336	\$ 261	\$ 62,489
Accounts Payable							
Bookkeeper	34,443.33	\$ 2,534	\$ 2,120		\$ 12,137	\$ 50	\$ 49,959
Payroll Specialist	37,775.20	\$ 2,926	\$ 2,448		\$ 18,227	\$ 50	\$ 51,896
Accounts Manager (15%)	\$ 9,387			\$ 899	\$ 667	\$ 350	\$ 11,403
							\$ 175,747

2006
Bruce 57,390.90
Debbie 34,310.32
Lisa 41,927.04
Koddy 62,400.00
MA 43,242.48

0.2 0.3 0.100
0.2 0.3 0.100

TO: Robert Healy
FROM: David Sellers
SUBJECT: Treasurer's Office Responsibilities
DATE: June 14, 2005

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's Office:

- Payroll and Accounts Payable bank reconciliation
- Balance monthly totals between Treasurer and LTHS
- Provide printing costs for envelopes for payroll and accounts payable checks.
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoices is expected prior to the close of the fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2004-2005

	Salary 04-05	OASDI Medicare	IMRF	Medical Insurance	Life Insurance	Total
Database Administrator (75%)	\$ 53,703.00	\$ 4,108.28	\$ 3,587.36	\$ 4,447.50	\$ 309.00	\$ 66,155.14
Accounts Payable Bookkeeper	34,443.33	2,634.91	2,300.81	12,137.00	50.00	51,566.06
Payroll Specialist	39,775.20	3,042.80	2,656.98	8,226.50	50.00	53,751.49
Accounting Manager (15%)	8,100.00	619.65	541.08	2,070.97	47.00	11,378.70
Printing Expense - see attached						1,717.10
						<u>\$184,568.48</u>

LYONS TOWNSHIP HIGH SCHOOL

DAVID S. SELLERS
Director of Business Services

DISTRICT OFFICE
NORTH CAMPUS
100 S. Brainard Ave.
LaGrange, IL 60525
(708) 579-6462

SOUTH CAMPUS
4900 S. Willow Springs Rd.
Western Springs, IL 60558

TO: Robert Healy

FROM: David Sellers

SUBJECT: Treasurer's Office Responsibilities

DATE: June 14, 2006

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's Office

- Payroll and Accounts Payable bank reconciliation
- Balance monthly totals between Treasurer and LTHS
- Provide printing costs for envelopes for payroll and accounts payable checks.
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoices is expected prior to the close of the fiscal year.

Lyons Township High School District 204
Service Costs for 2005-06

	Salary	Taxes	LIFE Brid Paid	Medical/Dental Brid Paid	Total	Percentage	Total
Accounting Mgr-KM	\$ 62,400.00	\$ 10,302.24	\$ 311.04	\$ 11,762.41	\$ 84,775.69	15.00%	\$ 12,716.35
Payroll-LT	\$ 41,927.04	\$ 6,922.15	\$ 86.40	\$ 8,349.31	\$ 57,284.90	100.00%	\$ 57,284.90
Accts Payable-DC	\$ 36,310.32	\$ 5,994.83	\$ 86.40	\$ 12,317.42	\$ 54,708.97	100.00%	\$ 54,708.97
Database Adm-BH-75%	\$ 43,043.18	\$ 5,329.82	\$ 129.60	\$ 2,843.08	\$ 51,345.67	75.00%	\$ 38,509.26
Database Adm-SB-25%	\$ 22,500.00	\$ 3,714.75	\$ 97.20	\$ 2,940.60	\$ 29,252.55	75.00%	\$ 21,939.41
							\$ 185,158.90


Lyons Township High School District 204

BUSINESS OFFICE RATE HISTORY '06

		Salary	Taxes	LIFE Brd Paid	Medical/Dental Brd Paid	Total	Percentage	Total
Accounting Mgr-KM	F-PPO	\$ 62,400.00	\$ 10,302.24	\$ 311.04	\$ 11,762.41	\$ 84,775.69	15.00%	\$ 12,716.35
Payroll-LT	C-NROA	\$ 41,927.04	\$ 6,922.15	\$ 86.40	\$ 8,349.31	\$ 57,284.90	100.00%	\$ 57,284.90
Accts Payable-DC	F-NROA	\$ 36,310.32	\$ 5,994.83	\$ 86.40	\$ 12,317.42	\$ 54,708.97	100.00%	\$ 54,708.97
Database Adm-BH	S-PPO	\$ 57,390.90	\$ 9,475.24	\$ 172.80	\$ 3,790.77	\$ 70,829.71	75.00%	\$ 53,122.28
Insurance-MM	S-PPO	\$ 43,242.48	\$ 7,139.33	\$ 86.40	\$ 3,790.77	\$ 54,258.98	0.00%	\$ -
Michael Ditchie		\$ 45,356.82	\$ 7,488.41	\$ 86.40		\$ 52,931.63		
								\$ 177,832.51

LYONS TOWNSHIP HIGH SCHOOL

Business Office • 100 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert Healy
FROM: David Sellers 
SUBJECT: Treasurer's Office Responsibilities
DATE: June 7, 2007

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's Office:

- Payroll and Accounts Payable bank reconciliation
- Balance monthly totals between Treasurer and LTHS
- Provide printing costs for payroll and accounts payable checks
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoices is expected prior to the close of the fiscal year.

District	6/30/2005	6/30/2006
101	\$11,971,408.83	\$12,297,000.03
102	\$28,196,462.00	\$25,582,652.33
103	\$22,656,170.51	\$23,218,834.09
104	\$16,015,978.94	\$17,948,816.10
105	\$15,550,783.91	\$12,581,984.14
106	\$16,084,343.97	\$15,518,083.16
107	\$10,509,369.15	\$10,070,253.37
108	\$4,765,240.24	\$3,489,369.73
109	\$24,431,446.25	\$23,599,076.08
204	\$59,967,953.39	\$52,660,293.44
2045	\$16,153,006.16	\$16,873,357.90
217	\$27,252,017.21	\$26,539,133.96
999	\$1,996,311.01	\$1,022,195.52

\$255,550,491.57 \$241,401,049.85

To: KATHY MORAN
From: BOB HEALY

5/30/2007

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2006-2007

	Salary 06-07	OASDI 6.2%	Medicare 1.45%	IMRF 8.86%	Medical Insurance	Life & LTD	Total	Percent applied	Total
Database Administrator (75%)	\$ 78,000.00	\$ 4,836.00	\$ 1,131.00	\$ 6,910.80	\$ 11,622.19	\$ 759.72	\$ 103,259.71	\$ 0.75	\$ 77,444.78
Accounts Payable Bookkeeper	\$ 37,627.20	\$ 2,332.89	\$ 545.59	\$ 3,333.77	\$ 12,672.83	\$ 39.60	\$ 56,551.88	\$ 1.00	\$ 56,551.88
Payroll Specialist	\$ 43,430.40	\$ 2,692.68	\$ 629.74	\$ 3,847.93	\$ 7,514.80	\$ 39.60	\$ 58,155.16	\$ 1.00	\$ 58,155.16
Accounting Manager (15%)	\$ 65,520.00	\$ 4,062.24	\$ 950.04	\$ 5,805.07	\$ 11,622.19	\$ 638.16	\$ 88,597.70	\$ 0.15	\$ 13,289.66
Microtoner for check printing	\$224,577.60	\$ 13,923.81	\$ 3,256.38	\$ 19,897.58	\$ 43,432.01	\$ 1,477.08	\$ 306,564.45	\$	\$ 994.96
									\$ 206,436.44

Morici, Mary Ann

From: Moran, Kathy
 Sent: Tuesday, May 29, 2007 1:52 PM
 To: Morici, Mary Ann
 Subject: Insurance expense

Mary Ann,

Can you tell me the FY07 board expense for medical and life insurance for the following employees?

	MED	LIFE	LTD
Kathy Moran	\$1622.19/yr	\$172.92/yr	\$465.24/yr
Lisa Touloumis	\$11622.19/yr	\$39.60/yr	—
Debbie Cook	\$12672.83/yr	\$39.60/yr	—
Sherri Bugyis	\$11622.19/yr	\$205.92/yr	\$553.80/yr

What was Lisa's old amount?

Thanks,
 Kathy

LISA - couple - \$7514.80

5/30/2007

D204-00238

PAY 335.12 - FY 07 - Employee Assignments/Contracts
 [Buttons: Print, Save, Cancel, etc.]
 [Buttons: Add, Edit, Delete, etc.]
 [Buttons: View, Refresh, etc.]
 [Buttons: Search, Filter, etc.]
 [Buttons: Export, Import, etc.]
 [Buttons: Help, About, etc.]
 [Buttons: Log Out, etc.]

EMPLOYEE	ASSIGNMENT	CONTRACT
10,000,000,000,000,000	100,0000	70,000.00

Log Out

PAY 345.12 - FY 07 - Employee Assignments, Contracts
 [Buttons: Add, Edit, Delete, Print, etc.]

Search: [Field] [Go]
 Filter: [Field] [Go]


[Buttons: Add, Edit, Delete, Print, etc.]

Employee ID	Position	Salary
18,888,2528,1681,7368	188.8888	43,438.48

[Logout]

LYONS TOWNSHIP HIGH SCHOOL

Business Office • 106 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert Healy
FROM: David Sellers 
SUBJECT: Treasurer's Office Responsibilities
DATE: June 7, 2007

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's Office:

- Payroll and Accounts Payable bank reconciliation
- Balance monthly totals between Treasurer and LTHS
- Provide printing costs for payroll and accounts payable checks
- Annual salary and benefit costs for 4 employees as per attached invoice


Payment of attached invoices is expected prior to the close of the fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2006-2007

	Salary 06-07	OASDI 6.2%	Medicare 1.45%	IMRF 8.86%	Medical Insurance	Life & LTD	Total	Percent applied	Total
Database Administrator (75%)	\$ 78,000.00	\$ 4,836.00	\$ 1,131.00	\$ 6,910.80	\$ 11,822.19	\$ 759.72	\$ 103,259.71	\$ 0.75	\$ 77,444.78
Accounts Payable Bookkeeper	\$ 37,827.20	\$ 2,332.89	\$ 545.59	\$ 3,333.77	\$ 12,872.83	\$ 39.80	\$ 56,551.88	\$ 1.00	\$ 56,551.88
Payroll Specialist	\$ 43,430.40	\$ 2,692.68	\$ 629.74	\$ 3,847.53	\$ 7,514.80	\$ 39.80	\$ 58,155.16	\$ 1.00	\$ 58,155.16
Accounting Manager (15%)	\$ 65,520.00	\$ 4,062.24	\$ 950.04	\$ 5,805.07	\$ 11,622.19	\$ 638.16	\$ 88,597.70	\$ 0.15	\$ 13,289.66
Microtamer for check printing									\$ 994.96
	\$224,577.60	\$ 13,923.81	\$ 3,256.38	\$ 19,897.58	\$ 43,432.01	\$ 1,477.08	\$ 306,564.45		\$ 206,436.44

LYONS TOWNSHIP HIGH SCHOOL

Business Office • 100 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert Healy
FROM: David Sellers 
SUBJECT: Treasurer's Office Responsibilities
DATE: June 9, 2008

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's Office:

- Payroll and Accounts Payable bank reconciliation
- Balance monthly totals between Treasurer and LTHS
- Provide printing costs for payroll and accounts payable checks
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoices is expected prior to the close of the fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2007-2008

	Salary 07-08	OASDI 6.2%	Medicare 1.45%	IMRF 8.86%	Medical Insurance	Life & LTD	Total	Percent applied	Total
Database Administrator (75%)	\$ 81,120.00	\$ 5,029.44	\$ 1,176.24	\$ 7,187.23	\$ 11,622.19	\$ 759.72	\$ 106,894.82	\$ 0.75	\$ 80,171.12
Accounts Payable Bookkeeper	\$ 39,351.36	\$ 2,439.78	\$ 570.59	\$ 3,486.53	\$ 12,672.83	\$ 39.60	\$ 58,560.70	\$ 1.00	\$ 58,560.70
Payroll Specialist	\$ 45,351.36	\$ 2,811.78	\$ 657.59	\$ 4,018.13	\$ 7,514.80	\$ 39.60	\$ 60,393.27	\$ 1.00	\$ 60,393.27
Accounting Manager (15%)	\$ 68,796.00	\$ 4,265.35	\$ 997.54	\$ 6,095.33	\$ 11,622.19	\$ 638.16	\$ 92,414.57	\$ 0.15	\$ 13,862.19
	\$234,618.72	\$ 14,546.36	\$ 3,401.97	\$ 20,787.22	\$ 43,432.01	\$ 1,477.08	\$ 318,263.36		\$ 212,987.27

LYONS TOWNSHIP HIGH SCHOOL

Business Office • 100 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert Healy
FROM: David Sellers
SUBJECT: Treasurer's Office Responsibilities
DATE: June 9, 2009

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's Office:

- Payroll and Accounts Payable bank reconciliation
- Balance monthly totals between Treasurer and LTHS
- Provide printing costs for payroll and accounts payable checks
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoices is expected prior to the close of the fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2008-2009

	Salary 08-09	OASDI 6.2%	Medicare 1.45%	IMRF 8.32%	Medical Insurance	Life & LTD	Total	Percent applied	Total
Database Administrator (75%)	\$ 85,176.00	\$ 5,280.91	\$ 1,235.05	\$ 7,086.64	\$ 10,225.81	\$ 829.20	\$ 109,833.62	\$ 0.75	\$ 82,375.21
Accounts Payable Bookkeeper	\$ 40,841.38	\$ 2,532.17	\$ 592.20	\$ 3,398.00	\$ 11,157.46	\$ 39.60	\$ 58,560.81	\$ 1.00	\$ 58,560.81
Payroll Specialist	\$ 47,167.92	\$ 2,924.41	\$ 683.93	\$ 3,924.37	\$ 10,225.81	\$ 39.60	\$ 64,966.05	\$ 1.00	\$ 64,966.05
Accounting Manager (15%)	\$ 71,892.00	\$ 4,457.30	\$ 1,042.43	\$ 5,981.41	\$ 10,225.81	\$ 700.56	\$ 94,299.52	\$ 0.15	\$ 14,144.93
Micro Toner	\$245,077.30	\$ 15,194.79	\$ 3,553.62	\$ 20,390.43	\$ 41,834.89	\$ 1,608.96	\$ 327,659.99		\$ 781.01
									\$ 220,828.01

Morici, Mary Ann

From: Moran, Kathy
Sent: Tuesday, June 09, 2009 6:43 AM
To: Morici, Mary Ann
Subject: Insurance costs

*Board Paid
2008-09*

Hi Mary Ann,

I need the district costs for medical and life insurance (listed separately) for the following employees:

	MED-DENT	LIFE	LTD
F-PPD Kathy Moran	10,225.81	190.08	510.48
F-PPD Lisa Touloumis	10,225.81	39.60	
F-BES Deb Cook	11,157.46	39.60	
S-PPD Mary Ann Morici	3212.71	39.60	
F-PPD Lottie Komperda	10,225.81	39.60	
F-PPD Sherri Bugyis	10,225.81	324.40	604.80

Thanks,
Kathy

6/9/2009

D204-00253

LYONS TOWNSHIP HIGH SCHOOL

Business Office • 100 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert Healy

FROM: David Sellers

SUBJECT: Treasurer's Office Responsibilities

DATE: June 14, 2010

Following is a list of responsibilities that District 204 proposes become the direct cost of the Township Treasurer's Office

- Payroll and Accounts Payable bank reconciliation
- Balance monthly totals between Treasurer and LTHS
- Provide printing costs for envelopes for payroll and accounts payable checks.
- Annual salary and benefit costs for 5 employees as per attached invoice

Payment of attached invoices is expected prior to the close of the fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2009-10

	Salary 09-10	OASDI 6.2%	Medicare 1.45%	IMRF 8.32%	Medical Insurance	Life & LTD	Total	Percent applied	Total
Database Administrator (75%)	\$ 87,731.00	\$ 5,439.32	\$ 1,272.10	\$ 7,299.22	\$ 10,947.53	\$ 853.89	\$ 113,543.06	\$ 0.75	\$ 85,157.30
Accounts Payable Bookkeeper	\$ 42,073.00	\$ 2,608.53	\$ 610.06	\$ 3,500.47	\$ 10,947.53	\$ 39.60	\$ 59,779.19	\$ 1.00	\$ 59,779.19
Accounts Payable Bookkeeper	\$ 38,043.36	\$ 2,358.69	\$ 551.63	\$ 3,165.21	\$ 10,947.53	\$ 39.60	\$ 55,106.01	\$ 1.00	\$ 55,106.01
Payroll Specialist	\$ 43,344.00	\$ 2,687.33	\$ 628.49	\$ 3,606.22	\$ 6,568.50	\$ 39.60	\$ 56,874.14	\$ 1.00	\$ 56,874.14
Accounting Manager (20%)	\$ 74,049.00	\$ 4,591.04	\$ 1,073.71	\$ 6,160.88	\$ 10,947.53	\$ 722.43	\$ 97,544.59	\$ 0.20	\$ 19,508.92
Micro Toner	\$285,240.36	\$ 17,684.90	\$ 4,135.99	\$ 23,732.00	\$ 50,358.62	\$ 1,695.12	\$ 382,846.99		\$ 318.80
									\$ 276,744.35

	Medical Ins	Life	LTD
Bugyis, S	\$ 10,992.43	\$ 1,192.80	\$ 99.40
Moran, K	\$ 10,992.43	\$ 1,006.77	\$ 83.90
Cook, D	\$ 12,129.29	\$ 32.40	
Stone, P	\$ 10,992.43	\$ 32.40	
Henneman, K	\$ 10,992.43	\$ 32.40	
Morici, M	\$ 3,435.12	\$ 32.40	
Komperda, W	\$ 12,344.42	\$ 32.40	

10,021.82



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Right Away.™

VISIT CDWG ON THE INTERNET

INVOICE DATE		INVOICE NUMBER		INVOICE TERMS		DUE DATE		
12/03/2008		MNX2128		NET 30 Days-Gov/Ed		01/02/2009		
OUR PART NO.	DESCRIPTION			QTY ORD	QTY SHIP	QTY B/O	UNIT PRICE	TOTAL
076514	TROY MICR 8000 SSI TONER CART Manufacture Part Number: 02-17981-001			1	1	0	\$385.99	\$385.99
<p>ACH INFORMATION: THE NORTHERN TRUST ROUTING NO.: 071000152 60 SOUTH LA SALLE STREET ACCOUNT NAME: CDW GOVERNMENT INC CHICAGO, IL 60676 ACCOUNT NO.: 91057</p> <p>HAVE QUESTIONS ABOUT YOUR ACCOUNT? PLEASE EMAIL US AT: credit@cdw.com</p>								
ORDER DATE 11/25/2008	SHIP VIA FEDEX Ground		PURCHASE ORDER NO. 91554		CUSTOMER NO. 191500		PRODUCT SUBTOTAL	\$385.99
SALESPERSON KEVIN MCMAHON 847-371-7113 kevinmcm@cdwg.com			SHIP TO: LYONS TOWNSHIP HIGH SCHOOL DEBBIE COOK 100 S BRAINARD AVE LA GRANGE IL 60525-2100		SALES ORDER NUMBER MMS1197		SHIPPING	\$0.00
							SALES TAX	\$0.00
							INVOICE AMOUNT	\$385.99
							AMOUNT DUE	\$385.99

CDW GOVERNMENT, INC. AN ILLINOIS CORPORATION FEIN 36-4230110

D204-00260



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Right Away.™

VISIT CDWG ON THE INTERNET

INVOICE DATE		INVOICE NUMBER		INVOICE TERMS		DUE DATE	
05/11/2009		PB11796		NET 30 Days-Gov/Ed		06/10/2009	
OUR PART NO.	DESCRIPTION			QTY	UNIT PRICE	TOTAL	
076514	TROY MICR 8000 5SI TONER CART Manufacture Part Number: 02-17981-001			1	\$385.03	\$385.03	
ORIGINAL INVOICE THANK YOU FOR YOUR ORDER							
BANK INFORMATION: THE NORTHERN TRUST 60 SOUTH LA SALLE STREET CHICAGO, IL 60671				ROUTING NO.: 071008152 ACCOUNT NAME: CDW GOVERNMENT INC ACCOUNT NO.: 81957			
HAVE QUESTIONS ABOUT YOUR ACCOUNT? PLEASE EMAIL US AT: credit@cdw.com							
ORDER DATE	SHIP VIA	PURCHASE ORDER NO.		CUSTOMER NO.		PRODUCT SUBTOTAL	
05/07/2009	UPS Ground (1-2 day)	92528		191500		\$385.03	
SALESPERSON		SHIP TO:		SALES ORDER NUMBER		SHIPPING	
KEVIN MCMAHON 847-371-7113 kevinmcm@cdwg.com		LYONS TOWNSHIP HIGH SCHOOL KAREN BROWN 100 S BRAHARD AVE LA GRANGE IL 60525-2100		NTS2720		\$9.99	
						SALES TAX	\$0.00
						INVOICE AMOUNT	\$395.02
						AMOUNT DUE	\$395.02

PAID
MAY 19 2009
BY: _____

CDW GOVERNMENT, INC. AN ILLINOIS CORPORATION FEIN 36-4230110



LYONS TOWNSHIP HIGH SCHOOL

Business Office • 100 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert G. Healy, Township School Treasurer

FROM: David S. Sellers, Director of Business Services

SUBJECT: Treasurer's Office Responsibilities

DATE: June 1, 2011

Following is a list of responsibilities that District 204 proposes become the direct cost of the Lyons Township Treasurer's Office:

- Payroll and Accounts Payable bank reconciliations
- Balance monthly General Ledger totals between Treasurer and LTHS
- Provide printing costs for payroll checks
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoices will be deferred and reviewed next fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2010-11

	Salary 10-11	OASDI 6.2%	Medicare 1.45%	IMRF 8.32%	Medical Insurance	Life & LTD	Total	Percent applied	Total
Database Administrator	\$ 87,731.00	\$ 5,439.32	\$ 1,272.10	\$ 7,299.22	\$ 10,992.43	\$ 1,292.20	\$ 114,026.27	\$ 0.75	\$ 85,519.70
Accounts Payable Bookkeeper	\$ 43,326.00	\$ 2,686.21	\$ 628.23	\$ 3,604.72	\$ 12,129.29	\$ 1,090.67	\$ 63,465.12	\$ 1.00	\$ 63,465.12
Accounts Payable Bookkeeper	\$ 39,191.36	\$ 2,429.86	\$ 568.27	\$ 3,260.72	\$ 10,992.43	\$ 39.60	\$ 56,482.25	\$ 1.00	\$ 56,482.25
Payroll Specialist	\$ 44,516.16	\$ 2,760.00	\$ 645.48	\$ 3,703.74	\$ 10,992.43	\$ 39.60	\$ 62,657.42	\$ 1.00	\$ 62,657.42
Accounting Manager	\$ 76,270.00	\$ 4,728.74	\$ 1,105.92	\$ 6,345.66	\$ 10,992.43	\$ 722.43	\$ 100,165.18	\$ 0.15	\$ 15,024.78
Micro Toner to print checks	\$291,034.52	\$ 18,044.14	\$ 4,220.00	\$ 24,214.07	\$ 56,099.01	\$ 3,184.50	\$ 396,796.24		\$ 385.99
									\$ 283,535.26

**Office
DEPOT**

Office Depot, Inc
PO BOX 630813
CINCINNATI OH
45263-0813

FEDERAL ID:59-2663954

451819

ORIGINAL INVOICE

THANKS FOR YOUR ORDER

IF YOU HAVE ANY QUESTIONS
OR PROBLEMS, JUST CALL US

FOR CUSTOMER SERVICE ORDER: (888) 263-3423
FOR ACCOUNT: (800) 721-6592

INVOICE NUMBER	AMOUNT DUE	PAGE NUMBER
486350939001	316.80	Page 1 of 1
INVOICE DATE	TERMS	PAYMENT DUE
31-AUG-09	Net 30	02-OCT-09

BILL TO:

ATTN:ACCOUNTS PAYABLE
LYONS TWP HIGH SCH
C/O BUSINESS OFFICE
100 S BRAINARD AVE
LA GRANGE IL 60525-2100

SHIP TO:

LYONS TWP HIGH SCH
NORTH CAMPUS
100 S BRAINARD AVE
LA GRANGE IL 60525-2100



ACCOUNT NUMBER 28502485	PO # 100846 - <u>Atose P.O.</u>	SHIP TO ID NORTH CAMP	ORDER NUMBER 486350939001	ORDER DATE 27-AUG-09	SHIPPED DATE 31-AUG-09		
BILLING ID 175346	ACCOUNT MANAGER RELEASE	ORDERED BY STONE, PATTY	DESKTOP	ACCT # 2520.4100.7300 ✓			
CATALOG ITEM #/ MANUF CODE	DESCRIPTION/ CUSTOMER ITEM #	U/H TAX	QTY ORD	QTY SHP	QTY B/O	UNIT PRICE	EXTENDED PRICE
905290 TRS0281300001	TONER,4014/4015/4515,MICR, 905290	EA Y	1	1	0	316.800	316.80
PAID SEP 14 2009							
BY: _____							
8 SEP 2009 PM 2:41							
SUB-TOTAL							316.80
DELIVERY							0.00
SALES TAX							0.00
TOTAL							316.80

All amounts are based on USD currency

To return supplies, please repack in original box and insert our packing list, or copy of this invoice. Please note problem so we may issue credit or replacement, whichever you prefer. Please do not ship collect. Please do not return furniture or machines until you call us first for instructions. Shortage or damage must be reported within 5 days after delivery.

005108-000249

D204-00267

LYONS TOWNSHIP HIGH SCHOOL

Business Office • 100 S. Brainard Ave. • LaGrange, IL 60525 • (708) 579-6300 • FAX (708) 579-6474

TO: Robert Healy

FROM: David Sellers

SUBJECT: Treasurer's Office Responsibilities

DATE: June 13, 2012

Following is a list of District 204 responsibilities that are a direct cost of the Township Treasurer's Office

- Payroll and Accounts Payable bank reconciliation
- Balance monthly General Ledger totals between Treasurer and LTHS
- Provide printing costs for envelopes for payroll and accounts payable checks.
- Annual salary and benefit costs for 4 employees as per attached invoice

Payment of attached invoice will be deferred and reviewed next fiscal year.

LYONS TOWNSHIP HIGH SCHOOL DISTRICT 204
COSTS FOR 2011-12

	Salary: 11-12	OASDI 6.2%	Medicare 1.45%	IMRF 8.32%	Medical Insurance	Life & LTD	Total	Percent Applied	Total
Database Administrator	\$ 93,978.00	\$ 5,826.64	\$ 1,362.68	\$ 7,818.97	\$ 12,235.40	\$ 306.36	\$121,528.05	75%	\$ 91,146.03
Accounts Payable Bookkeeper	\$ 45,059.04	\$ 2,793.66	\$ 653.36	\$ 3,748.91	\$ 13,399.26	\$ 32.40	\$ 65,686.63	100%	\$ 65,686.63
Accounts Payable Bookkeeper	\$ 40,757.76	\$ 2,526.98	\$ 590.99	\$ 3,391.05	\$ 12,235.40	\$ 32.40	\$ 59,534.57	100%	\$ 59,534.57
Payroll Specialist	\$ 46,290.96	\$ 2,870.04	\$ 671.22	\$ 3,851.41	\$ 12,235.40	\$ 32.40	\$ 65,951.43	100%	\$ 65,951.43
Accounting Manager	\$ 79,321.00	\$ 4,917.90	\$ 1,150.15	\$ 6,599.51	\$ 12,235.40	\$ 258.96	\$104,482.92	15%	\$ 15,672.44
	\$305,406.76	\$ 18,936.22	\$ 4,428.40	\$ 25,409.84	\$ 62,340.86	\$ 662.52	\$417,183.60		\$297,991.10

PAY 315.12 - FY 12 - Employee Assignments/Contracts

EMPLOYEE NAME: [REDACTED] PAY RATE: [REDACTED]

EMPLOYEE ID: [REDACTED] CONTRACT TYPE: [REDACTED]

EMPLOYEE STATUS: [REDACTED] CONTRACT START DATE: [REDACTED]

EMPLOYEE END DATE: [REDACTED] CONTRACT END DATE: [REDACTED]

EMPLOYEE ID	PAY RATE	CONTRACT TYPE
3810100/20031147300	100.0000	10/02/00

Local Up

PAY.345.12 - FY 12 - Employee Assignments/Contracts
 [Buttons: File, Edit, View, Print, etc.]

[Text Fields: Employee Name, Position, etc.]

[Text Fields: Start Date, End Date, etc.]

Employee ID	Position	Start Date	End Date
201810254210126400	10010000	05/15/2011	05/15/2011

[Buttons: Add, Edit, Delete, etc.]

[Button: Logout]

PAY 2012-13 12 - Employee Assignments/Contracts

Name:
 Title:
 Status:

Search Group:
 Search Criteria:

Employee ID	Employee Name	Position	Location
1001001001001001	1001001001001001	1001001001001001	1001001001001001

CERTIFICATE OF SERVICE

Jay R. Hoffman, an attorney, certifies that on March 8, 2017, he caused the foregoing pleading to be served by email on the following attorneys:

Gerald E. Kubasiak

kubasiak@millercanfield.com

Steven J. Rotunno

rotunno@millercanfield.com

Barry P. Kaltenbach

kaltenbach@millercanfield.com

Gretchen M. Kubasiak

kubasiakg@millercanfield.com

Miller, Canfield, Paddock and Stone, P.L.C.

Suite 2600

225 W. Washington St.

Chicago, IL 60606

s/Jay R. Hoffman

PAY 215.12 - FY 12 - Employee Assignments/Contrails

TITLE:
 JOB:
 EMP:
 CONTR:

REPORT:
 PRINT:
 SAVE:

SEARCH:
 FILTER:

EMP ID	EMP NAME	EMP TITLE	EMP STATUS	EMP CONTRACT
1001001	1001001	1001001	1001001	1001001
1001002	1001002	1001002	1001002	1001002
1001003	1001003	1001003	1001003	1001003
1001004	1001004	1001004	1001004	1001004
1001005	1001005	1001005	1001005	1001005
1001006	1001006	1001006	1001006	1001006
1001007	1001007	1001007	1001007	1001007
1001008	1001008	1001008	1001008	1001008
1001009	1001009	1001009	1001009	1001009
1001010	1001010	1001010	1001010	1001010

INVOICE DATE 07/20/10		INVOICE NUMBER THR1890		Net 30 Days		08/19/10	
ORDER DATE 07/19/10		SHIP VIA UPS Ground (1-2 day)		PURCHASE ORDER NUMBER 110479		CUSTOMER NUMBER 191500	
ITEM NUMBER 076514	DESCRIPTION TROY MICR 8000 SSI TONER CART Manufacturer Part Number: 02-17981-001			QTY ORD 1	QTY SHIP 1	QTY B/O 0	UNIT PRICE 385.99
						TOTAL 385.99	

28 JUL 2010 AM 6:30

PAID
AUG 03 2010

BY: _____

GO GREEN!

CDW is happy to announce that paperless billing is now available! If you would like to start receiving your invoices as an emailed PDF, please email CDW at paperlessbilling@cdw.com. Please include your Customer number or an Invoice number in your email for faster processing.

REDUCE PROCESSING COSTS AND ELIMINATE THE HASSLE OF PAPER CHECKS!

Begin transmitting your payments electronically via ACH using CDW's bank and remittance information located at the top of the attached payment coupon. Email credit@cdw.com with any questions.

ACCOUNT MANAGER		SHIPPING ADDRESS:		SUBTOTAL		\$385.99
KEVIN MCMAHON 847-371-7113 kevinmcm@cdw.com		LYONS TOWNSHIP HIGH SCHOOL DEB COOK - 108 100 S BRAINARD AVE LA GRANGE IL 60525-2100		SHIPPING		\$11.18
SALES ORDER NUMBER VDG2997				SALES TAX		\$0.00
				AMOUNT DUE		\$397.17



00010002

Cage Code Number 1KH72
DUNS Number 02-615-7235

ISO 9001 and ISO 14001 Certified
CDW GOVERNMENT FEIN 36-4230110

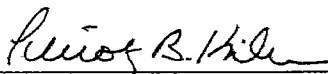
HAVE QUESTIONS ABOUT YOUR ACCOUNT?
PLEASE EMAIL US AT credit@cdw.com
VISIT US ON THE INTERNET AT www.cdw.com

Page 1 of 1

D204-00280

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, as Superintendent of Lyons Township High School District 204, I certify that the statements set forth in the foregoing pleading are true and correct.



Dr. Timothy B. Kilrea

CERTIFICATE OF SERVICE

Jay R. Hoffman, an attorney, certifies that on March 8, 2017, he caused the foregoing pleading to be served by email on the following attorneys:

Gerald E. Kubasiak

kubasiak@millercanfield.com

Steven J. Rotunno

rotunno@millercanfield.com

Barry P. Kaltenbach

kaltenbach@millercanfield.com

Gretchen M. Kubasiak

kubasiakg@millercanfield.com

Miller, Canfield, Paddock and Stone, P.L.C.

Suite 2600

225 W. Washington St.

Chicago, IL 60606

s/Jay R. Hoffman