



# ALGONQUIN TOWNSHIP HIGHWAY DEPARTMENT

3702 U.S. Hwy 14, Crystal Lake, IL 60014

May 7, 2018

Robert Miller  
Anna May Miller  
1415 Main Street  
Cary, Illinois 60013

Re: Demand for return of Algonquin Township Road District Property

Mr. & Mrs. Miller:

Demand is hereby made upon both of you to immediately return to the Algonquin Township Road District all of the following items of property that were paid for by Algonquin Township Road District:

- I. Blink Cameras (installed in Miller Household at Road District Expense in January 2016 or thereabouts) charged to the Road District on 1/28/2016 in the amount of \$299.00
- II. 4 I-Pass Transponders (obtained on Township Paid I-Pass Account)
- III. Credit Cards issued to Algonquin township (The cards themselves)
  - a. American Express card ending in 5-21007
  - b. American Express card ending in 9-01005
  - c. American Express card ending in 9-01013
  - d. Chase Card
  - e. Capital One Card
- IV. Cellular Telephones –previously paid for with Road District funds including:
  - a. Those Cellular phones having been acquired at Road District expense and associated with the following telephone numbers:

(847) 878-1613
(847) 875-0548
(847) 343-3892
(847) 343-8732
(847) 343-3892
(224) 239-7852
(847) 970-0571

Each number was on The road district plan and the Road district plan had paid for the respective phones associated with each of them.



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- V. All computers paid for by Algonquin Township Road District in your possession including but not limited to two hard drives removed from servers located at Algonquin Township Road District at your direction by IT Connection Keith Seda and delivered to you on or about 4/4/2017.
- VI. Computer Tablets
  - a. iPad Air 2
  - b. iPad Air 2 Smart Case
- VII. Hand Tools
  - a. shovels
  - b. saws
  - c. wrenches
  - d. screwdrivers
  - e. hammers
  - f. drills
  - g. sawsalls.
- VIII. Cannon EOS Camera, lenses and tri-pod.
- IX. Credit Card Points/Economic Benefits associated with use of Credit Cards mentioned above in Section III.
- X. Any and all municipal License Plates for Algonquin Township Road District Owned Vehicles.
- XI. All gift cards purchased or otherwise acquired with Road District Funds including but not limited to American Express Gift Cards, Jewel Gift Cards, Barn Nursery Gift Cards, Levensger gift cards. Jewel on 6/2/2016 (\$160.90 & 210.90) Barn Nursery (\$1,250)
- XII. Clothing purchased with Algonquin Township Road District money or credit including but not limited to the following items:
  - a. Two pairs Women's Woolrich Kory Pants purchased (4/12/2011) \$98.00
  - b. Women's Woolrich fisher Island Tee purchased 4/12/2011 \$45.00
  - c. Woman's kordel Capri purchased 4/12/2011 \$55.00
  - d. Sales Tax to purchase clothing on 4/12/11 (\$15.95)
  - e. Cashmere Jacquard Cardigan Sweater.
  - f. Women's Supima Stripe pocket Cardigan Sweater
  - g. Women's boiled Wool Walker Coat
  - h. Women's Print Drape Ballet shirt,
  - i. Men's shirts embossed with the words Algonquin Township Highway Department or the Algonquin Township Road District.



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- j. Women's Drop shoulder Tuck shirt
  - k. Womens Mountain Parka (\$99)
  - l. Bison Leather belt (\$45)
  - m. Two Long sleeve Men's Woolrich polo shirts Extra Large (\$70)
  - n. A women's Raeburn II jacket (\$149.00)
  - o. A woman's woolrich Mountain laurel Wrap Cardigan (\$135.00)
  - p. A woman's Chelsea watch (\$78.00)
  - q. A Men's Woolrich fork Long Sleeve Polo shirt (\$35)
  - r. A Woman's Woolrich Plateau ridge Tote bag (\$135)
  - s. A woman's Woolrich Restless Brook Cartigan (\$99.00)
  - t. A Woman's Sheep Sweater (\$78.00)
  - u. A Woman's Woolrich Kenyon Sweater (\$69.00)
  - v. Woman's Alani Cardigan Sweater (\$89)
  - w. Womans's Land's End Fine Gage Performance Cardigan Sweater
  - x. General merchandise purchased at the Car Bath Wash in the amount of \$214.80
- XIII. A Levenger leather tote bag paid for with Algonquin Township Road District \$384.52
- XIV. A Levenger leather black leather pad portfolio \$176.37 purchased with Road district funds or credit on 1/19/2012.
- XV. A Levenger Brief bag purchased with Road District funds or credit on 1/19/2012 in the amount of \$211.44.
- XVI. A She\*Shelpers Western Clothing purchased 8/31/2008 \$215.89 (believed to be cowboy boots)
- XVII. Converted funds in the amount of \$47,384 paid to Robert Miller purportedly for sick time accrued prior to 1993 in violation of the Illinois Administrative Code and in contravention of 24 sworn statements of Robert Miller.
- XVIII. Two Truck loads of Salt given away by Bob Miller to the Illinois Railway Museum with a value of at least \$800.
- XIX. Payment of Road District money for meals at Hooters in Brookfield Wisconsin in the amount of \$288.92.
- XX. Payments of Road District money for Airline Tickets for Rebecca Lee in the amount of \$375.00 and associated transaction processing fee of \$9.95.



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- XXI. Payments of Algonquin Township Road District money for airline tickets for the minor child(Children) of Rebecca Lee in the amount of \$375.00 and associated transaction processing fee of \$9.95.
- XXII. Payments of Algonquin Township Road District money for Jose Cuervo in the amount of \$39.33
- XXIII. Payment of Algonquin Township Road District Money for Amazon purchases without receipts totaling \$3,476.28 on the following dates with corresponding amounts.

6/2/2016	\$41.97
6/5/2016	\$124.49
7/10/2014	\$230.28
7/22/2014	\$8.99
6/28/2014	\$155.04
7/10/2014	\$230.28
7/22/2014	\$8.99
4/29/2013	\$87.37
1/2/2013	\$180.05
1/3/2013	\$85.98
1/9/2013	\$169.99
1/10/2013	\$256.90
2/2/2016	\$269.97
2/16/2016	\$159.00
2/17/2016	\$254.97
2/18/2016	\$6.55
2/16/2016	\$502.04
2/26/2016	\$127.42
11/1/2014	\$79.00
11/1/2014	\$79.00
10/29/2014	\$209.00
10/29/2014	\$209.00

- XXIV. Payments of Algonquin Township Road District Money to Martenson Decorating for services at 1415 Main Street, Cary in the amount of \$4,090.00
- XXV. Payments of Road District money for Disneyland Admission in the amount of \$188



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- XXVI. Payments made to Birch totaling \$13,644.40 for the benefit of others and not the Algonquin Township Road District.
- XXVII. Payments made to Behm Paving totaling \$110,062 for the benefit of others and not the Algonquin Township Road District.
- XXVIII. Sporting Goods paid for on 8/11/2008 at Sports Authority in the amount of \$590.68.
- XXIX. Records in your possession and control belonging to the Algonquin Township Road District including but not limited to the following records:
- a. Emails of Robert Miller for the period of time commencing 1/1/2010 and continuing to May 15, 2017
  - b. E-mails of Anna May Miller during that period of time of her employment at the Algonquin Township Road District which were used in the ordinary course of business for the Algonquin township Road District.
  - c. All credit card Statements for the following credit or convenience cards issued to either of you by the Algonquin Township Road District including but not limited to:
    - i. American Express ending in 5-21007
    - ii. American Express ending in 9-01005
    - iii. American Express ending in 9-01013
    - iv. Chase Card
    - v. Capital One Card
  - d. All applications for credit associated with the following credit or convenience cards issued to either of you by the Algonquin Township Road District including but not limited to:
    - i. Applications for American Express ending in 5-21007
    - ii. Applications for American Express ending in 9-01005
    - iii. Applications for American Express ending in 9-01013
    - iv. Applications for Chase Card
    - v. Applications for Capital One
  - e. All Documents electronically removed from Road District Computers in concert with IT Connection/Keith Seda
  - f. All documents reflecting the payroll records of Robert Miller for the period of his employment at the Algonquin Township Road District.



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- g. All documents that refer or reflect any effort to obtain a destruction order from Illinois Secretary of State during January 1, 2015 thru May 15, 2017.
- h. All receipts of purchases from Amazon.com and paid for by the Road District for the period of 1/1/2010 to May 15, 2017.
- i. All legal opinions billed by Attorney James Kelly to Algonquin Township Road District including but not limited to opinions in the period of 1/1/2010 to May 15, 2017.
- j. Lease agreements by and between Road District and any of its employees for storage of automobiles and ATV's including motorcycles in the period of 1/1/2010 to May 15, 2017.
- k. Any and all records related to the payment of funds to Pear Automation and the location of the actual software purchased with Algonquin Township Road District Money
- l. Any and all Baxter Woodman work product in the period of 1/1/2010 to May 15, 2017 or associated with \$138,000 payment to Baxter Woodman by the Algonquin Township Road District.
- m. Any and all Communications and work product by and between Robert Miller or Anna May Miller and any employee of Birch in the period of 1/1/2010 to 5/15/2017.
- n. Any and all records related to the use of Sam's Club in house Account in name of Algonquin Township Road District in the period of 1/1/2010 to May 15, 2017.
- o. Any and all records related to HR Green Engineering in the period of 1/1/2010 to May 15, 2017.
- p. Any and all records related to Behm Paving including any work product in the period of 1/1/2010 to May 15, 2017.
- q. The monthly bills submitted for payment by Robert Miller against the Road District for the period of 1/1/2010 to May 15, 2017.
- r. Any document related to any of demands for return of any property or purchase or payment identified in this demand letter.



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Be Blessed,

Andrew Gasser,  
Algonquin Township Highway Commissioner

## Definitions Relating to this Demand letter

1. The definitions herein are intended to govern the meaning of this demand.
2. "You" shall mean either Robert Miller or Anna May Miller or both as context requires.
3. "Person[s]" means any natural person, firm, corporation, partnership, joint venture, organization, association, group, or legal entity.
4. The term "document" shall be construed in its broadest sense. It shall include, but not be limited to, all information retrievable from computer storage, including, but not limited to, electronic mail and electronic files in their native storage format (i.e. ".ppt" for Microsoft PowerPoint), and any printed, typewritten, handwritten, graphic, or recorded matter of any type and description, however and by whomever prepared, recorded, produced, reproduced, disseminated, or made, including, but not limited to, the following: all letters, minutes, notes, telegrams, facsimiles, electronic mail messages, reports, charts, accountant's statements, bank statements, books of account, ledgers, balance sheets, journals, account statements, lists, analyses, information sheets, financial publications, order forms, business records, personal records, financial statements, memoranda, summaries or records of conversations, tape recordings or transcripts, notebooks, data sheets, work sheets, recommendations, audio and videotape records, photographs and slides, statistics, studies, written agreements, checks, receipts, invoices, bills, and other writings, including computer printouts or information stored in



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5. computer memory banks or on any tapes, discs, or other electrical or mechanical forms or devices, and any draft of any of such material the content of which differs in any respect from the original, in the actual or constructive possession, custody or control of either of you.

6. As used herein, the terms "communicate," "communicated," "communication," "communicate with," or any derivation thereof, shall include any type of communication whatsoever, whether oral or written, including, but not limited to, conversations, discussions, telephone calls, interviews, letters, memoranda, negotiations, agreements, understandings, correspondence, telexes, telegrams or any other exchange of information of any kind, whether oral, written, electronic, or otherwise.

7. "Concerning," "relating to," "relate to," "evidence(s)," or "evidencing" means pertaining to, referring to, reflecting upon, evidencing, discussing, describing, mentioning, summarizing, or connecting in any way logically or factually to, the matter described in the Request.

8. "Statement" means any oral, written, court-reported, recorded or other expression of opinion, and any oral, written, court-reported, recorded, or other description of fact, which pertains to the occurrences alleged in the Complaint to Foreclose Mortgage, or to the damages claimed to have resulted therefrom. When "statement" is used in the context of a Credit Card or Debit card or convenience accounting card the term "Statement" shall mean that record of account issued by the card issuer periodically.





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8. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of these Requests for Admission of Facts all information and/or documents which might otherwise be construed to be outside their scope.

9. Reference to the singular shall include the plural and references to the plural shall include the singular.