

after reasonable inquiry". Illinois Supreme Court Rule 137. No reasonable inquire has been made, nor are there any facts stated to support these conclusions.

Had counsel for Plaintiffs performed any reasonable inquiry as required by the Illinois Supreme Court Rule 137, she would have found that on May 31, 2018 the McHenry Country State's Attorney released a report regarding allegations of criminal conduct on the part of Robert Miller. See attached as Exhibit F. **In this report at pages 5 and 6 the State's Attorney found no criminal conduct on the part of Robert J Miller.** No reasonable inquiry of any kind would lead to the belief that James Kelly was part of a criminal action. As there was no criminal conduct on the part of Robert J Miller, James Kelly could not have in any way colluded with Robert Miller to defraud the people of Algonquin Township. It is clear that the statements made by Counsel for Plaintiffs are not only false, but harassing in nature. As Plaintiffs had knowledge of the results of the State's Attorneys' investigation, their persistence in alleging collusion between Robert J Miller and James Kelly is made for the sole purpose of harassment and, as such, is clearly sanctionable. Counsel for Plaintiffs fails to establish any connection between this allegation and her Motion to Disqualify pursuant to rule 3.7. This baseless defamatory statement is simply inserted into an already incomprehensible pleading to further smear the reputation of James Kelly.

As the allegation of misconduct is written, Counsel for Plaintiffs fails to tie in how this allegation has anything to do with her Motion to Disqualify pursuant to Rule 3.7. This statement is simply placed in the incomprehensible argument, only making the motion more confusing and difficult to understand. Plaintiffs' motion could have been brought without this allegation; however, Counsel for Plaintiffs chose to include this harassing statement that has no factual basis.