

**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT – MUNICIPAL DIVISION**

FILED
9/19/2023 3:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
20231120674
Courtroom, 1112
24439122

Anthony J. Peraica & Associates, Ltd.,	)	20231120674
an Illinois Corporation,	)	
Plaintiff,	)	Case No.
v.	)	
	)	Total Amount Claimed: \$4,096.49 + costs
ROGER ROMANELLI,	)	
Defendant.	)	

**AFFIDAVIT OF ANTHONY J. PERAICA IN SUPPORT OF
COMPLAINT AT LAW FOR BREACH OF CONTRACT – COUNT I**

Now comes Affiant, ANTHONY J. PERAICA, of Anthony J. Peraica & Associates, Ltd.,
being first duly sworn on oath and states the following:

1. My name is Anthony J. Peraica; I am principal attorney with Anthony J. Peraica & Associates, Ltd., duly licensed to practice law in the State of Illinois, with its principal office located at 5130 South Archer Avenue, Chicago, Illinois 60632.
2. That Anthony J. Peraica & Associates, Ltd. was retained on November 30, 2022 by Defendant, ROGER ROMANELLI, to represent him as Plaintiff in his discrimination case captioned as *ROGER ROMANELLI v. VILLAGE OF HILLSIDE*, Case No. 2023-CH-02408.
3. That the usual and customary charge for office, conference and court time on November 30, 2022 was \$475.00 per hour for services rendered by Anthony J. Peraica; \$325.00 for services rendered by associate attorneys; \$175.00 per hour for services rendered by paralegals; and \$95.00 per hour for services rendered by secretaries and clerks.
4. That Anthony J. Peraica & Associates, Ltd. rendered service to Defendant, and/or advanced costs, in case number 23-CH-02408 on the following dates:



CLIENT: ROMANELLI,

ROGER

FILE NO: 22-1130-02

Description: Roger Romanelli v.
Village of Hillside

Case No: 23-CH-02408

CONTACT INFO

4406 Madison St.
Hillside, IL 60162
(773) 531-6370
hillsideforward@gmail.com

<u>DATE</u>	<u>PERSON</u>	<u>WORK DONE</u>	<u>TIME</u>	<u>FEE</u>	<u>COST</u>
11.30.2022	JA	Sent email to client re: Retainer Agreement to be signed and returned. Client said he will meet with Tony later this evening and bring signed retainer and initial retainer payment.	0.25	\$23.75	
11.30.2022	AJP	Meeting with client at Mariano's Store in Westchester - discussed case; retainer paid.	0.25	\$118.75	
11.30.2022	BKD	Opened file, created labels and billing chart.	0.25	\$43.75	
12.1.2022	JA	Sent email to client re: with attachments containing receipt for initial retainer payment and signed Retainer Agreement for client's records.	0.00	\$0.00	
12.10.2022	AJP	Telephone call with client re: friend taking video, video on YouTube channel; client will send us a copy of the video.	0.25	\$118.75	

12.03.2022	AJP	reviewed and organized file. Complaint to be filed by JH.	0.25	\$118.75
12.28.2022	JH	Drafted complaint under Open Meeting Act, research showed not possible under age discrimination equal protection; pulled minutes from Hillside meetings.	1.50	\$487.50
01.03.2023	AJP	Multiple telephone calls with client re: federal jurisdiction, complaint draft we sent, what would be most viable causes of action. Client wants to file in federal court if possible, client will email us his opinions, thoughts as to possible causes of action in federal court.	0.50	\$237.50
01.05.2023	JH	Follow up with client re: proceeding; discussed case with AJP.	0.25	\$81.25
02.06.2023	JH	Follow up with client.	0.00	\$0.00
02.24.2023	JH	Received documents from client, advised client that we will review and reply to him next week.	0.25	\$81.25
02.28.2023	JH	Reviewed clients documents; discussed with AJP the case laws re: Illinois Election Law.	0.75	\$243.75
02.28.2023	AJP	Telephone call with client re: case.	0.25	\$118.75
03.01.2023	AJP	Telephone call with client re: case update.	0.25	\$118.75
03.01.2023	SFB	Review of complaint.	0.25	\$118.75
03.02.2023	SFB	Research on election code on possible causes of action.	1.50	\$712.50

03.03.2023	SFB	Prepare new version of complaint; Research re: election; emailed to AJP and JH.	1.00	\$475.00
03.03.2023	AJP	Received file; reviewed amended complaint; spoke with SFB and JH about the need to modify further and to get this filed so client can use it for PR in April election; responded to client email.	0.50	\$237.50
03.10.2023	AJP	Telephone call with client re: the complaint and answered client's questions. Discussed SLAPP issues; client confirms to proceed with filing of case. Client wants proof of filing emailed to him as soon as it is received.	0.75	\$356.25
03.11.2023	BKD	E-filed Complaint and Exhibits; emailed to client E-filing submissions.	0.25	\$43.75
03.11.2023	BKD	Efiling fee for complaint filing.	0.00	\$0.00
03.13.2023	BKD	Received file stamped copy of complaint and emailed to client; prepared summons and e-file.	0.25	\$43.75
03.13.2023	BKD	Cook County Sheriff service fee.	0.00	\$0.00
03.28.2023	BKD	Received Appearance and Motion to Dismiss and email to client.	0.25	\$43.75
04.04.2023	AJP	File reviewed and given to SFB to respond to motion to dismiss.	0.25	\$118.75
04.06.2023	SFB	Telephone call with client and AJP re: case status, discussed case strategy.	0.50	\$237.50
				\$399.21
				\$60.00

04.06.2023	AJP	Telephone call with client and SFB re: case status, discussed case strategy.	0.50	\$237.50
04.19.2023	SFB	Research for Response to Motion.	1.00	\$475.00
04.20.2023	SFB	Preparation of draft of motion.	3.50	\$1,662.50
04.23.2023	SFB	Preparation of final draft of response and file.	3.00	\$1,425.00
05.12.2023	JA	Postage - mail to client.	0.00	\$0.60
05.12.2023	SFB	Review of Reply Memorandum.	0.25	\$118.75
05.15.2023	SFB	COURT APPEARANCE - Appear for status.	0.25	\$118.75
07.03.2023	SFB	Telephone call with client re: motion to dismiss and request for 8-31-23 hearing.	0.25	\$118.75
07.11.2023	SFB	COURT APPEARANCE - Appear for Status call.	0.75	\$356.25
08.02.2023	AJP	Meeting with client to discuss status of case; answered all clients questions and concerns, discussed all issues and went over all presentations, SLAPP action discussed, next court date 8-31-23 at 11:00 a.m. Client made payment.	0.50	\$237.50
08.02.2023	SFB	Meeting with client to discuss status of case; answered clients questions and concerns, discussed all issues and went over all presentations.	0.50	\$237.50
08.03.2023	JA	Postage - mail to client.	0.00	\$0.63
08.17.2023	MP	Check return fee.	0.00	\$25.00
08.18.2023	JA	Postage - mail to client.	0.00	\$0.63

08.21.2023	BK	Filed Motion to Withdraw and Notice of Motion.	0.25	\$43.75
08.21.23	BK	Sent Motion to Withdraw and Notice of Motion to opposing counsel and client.	0.25	\$43.75
TOTAL:			21.50	\$9,255.00

\$486.07

TOTAL FEES AND COSTS: \$9,741.07

PAYMENTS:

DATE PAYMENT

12.01.2022 \$5,000.00

TOTAL PAYMENTS:

\$5,000.00

BALANCE DUE:

-\$4,741.07

Notes:

PARA. INITIALS

MATTER: Civil

OPENED: 11/30/2022

Status:

Type:

Open

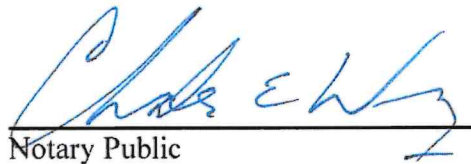
Hourly Fee

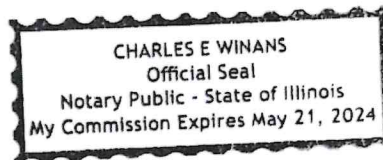
5. That in addition to attorney's fees, Anthony J. Peraica & Associates, Ltd. has expended the sum of \$486.07 in court costs, for a total of \$9,741.07 due and owing by Defendant.

6. That Defendant has paid the sum of \$5,000.00, leaving a balance of \$4,741.07 And further, Affiant sayeth naught.


ANTHONY J. PERAICA

Subscribed and Sworn to before me
this 11 day of September, 2023.


Notary Public



Anthony J. Peraica
Anthony J. Peraica & Associates, Ltd.
5130 S. Archer Avenue
Chicago, IL 60632
773-735-1700
Attorney No: 54011
support@peraica.com

STATE OF TEXAS
COUNTY OF DALLAS
FILED FOR RECORD
BY CLERK OF DISTRICT COURT
ON SEPTEMBER 19, 2023
AT 3:49 PM

074904462

08/15/2023

System Generated Hearing Date: 11/13/2023 9:30 AM

Location: Court Room 1112

Judge: Johnson, Sarah Rodak

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

RETURN REASON-C
STOP PAYMENT

9590706578
[074909962] 08/10/2023

STOP PAYMENT

ROGER ROMANELLI 12-98
4406 MADISON STREET
HILLSIDE IL 60162

4405

2-118/710
12

PAY TO THE
ORDER OF

8-2 FILED 83
Anthony Peraicat Assoc. \$5,000.00
Five Thousand
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
20231120674
Courtroom, 1112
24439122

Republic Bank
Berkeley, Illinois 60163

FOR

⑆071001180⑆ 419397⑈ 04405

⑆071001180⑆ 419397⑈04405 ⑈0000500000⑈

FILED DATE: 9/19/2023 3:49 PM 20231120674

227533000405001647000208000020





7610 W. Washington St., IN1-7202
Indianapolis IN 46231-7202

Questions?

800-242-7338



01647 TRP 111 050 22723 NNNNNNNNNNNN EXC2
ANTHONY J PERAICA & ASSOCIATES LTD
5130 S ARCHER AVE
CHICAGO IL 60632-4759

August 15, 2023

Account: 111/xxxxxxxxxxxx8828/0
Advice: 101738
Update: We're subtracting funds from your account above

Dear ANTHONY J PERAICA & ASSOCIATES LTD:

We received a check(s) previously deposited to your account that was returned to us as unpaid.

Here's the reason for the returned check(s):

Return Reason	Deposit Date	Internal Seq#	Amount
Stop Payment There is a stop payment on the check.	08/10/2023	99005566	\$5,000.00

1 Checks charged totaling: \$5,000.00

We subtracted the check(s) amount from your account and enclosed a copy of the returned check(s).

If you have questions, please call us at 800-242-7338.

Sincerely,

Customer Service

Enclosure



Law Offices of
ANTHONY J. PERAICA & ASSOCIATES, LTD.
5130 S. Archer Avenue, Chicago, Illinois 60632
(773) 735-1700 (Phone) (773) 585-3035 (Fax)
www.peraica.com

FILED
9/19/2023 3:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
20231120674
Courtroom, 1112
24439122

RETAINER AGREEMENT

Regarding the matter of: Romanelli v. Village of Hillside

The undersigned ("Client") hereby retain the Law Offices of Anthony J. Peraica & Associates, Ltd. ("Attorney") as attorneys to represent him/her/them in the processing of the matter herein described. The Law Offices of Anthony J. Peraica & Associates, Ltd. has informed the undersigned of the procedures involved in the matter described below:

1. A general advance in the sum of \$ _____. It is clearly understood by the undersigned that, should additional work be necessary, requested and/or performed other than that set forth herein or usually or customarily required for such matters, additional fees or costs may be billed to the Client(s).

X 2. To engage the firm, a general advance retainer of \$ 5,000 is required upon execution of this agreement. Attorney will charge at the rate of \$475.00 per hour for Anthony J. Peraica senior associate counsel, \$325.00 per hour for all other associates for all work, including depositions, court proceedings, hearings, or trial. To save Client money, Attorney employs paralegals and secretaries to provide basic legal services. Client agrees to pay for paralegal services at the rate of \$175.00 per hour, and for secretarial services at the rate of \$95.00 per hour. In addition to fees, Client will pay all expenses in the processing, settlement or litigation of the claim, including but not limited to court costs, cost of photographs, cost of police/medical/other reports or records, special process server fees, investigation fees, court reporter fees, expert witness fees, subpoena fees, copy service charges, messenger service fees, and all other reasonable costs. Any unused portion of general advance retainer paid shall be refunded to the client upon conclusion or termination of services.

3. Fees in the sum equal to ____ percent (____%) of any amounts recovered in the herein matter either by settlement or trial.

4. Other/Additional: _____

SCOPE OF REPRESENTATION: investigate and bring potential lawsuit against Village of Hillside on grounds of age or political discrimination

Attorney will provide Client with billing statements on at least a quarterly basis. Client will review each statement promptly and address any objection or error soon thereafter. If Client has no objections, he/she will pay all billings within ten days of the billing date. If Client objects, he/she will pay within ten days after resolution of any dispute.

Any balance owed by Client(s) for Attorney's fees and costs will be paid before the proceedings are concluded. Attorney cannot guarantee results and cannot predict a maximum charge. The final bill will be based solely on the



time spent and the costs advanced. Any unpaid balances or judgments for fees and costs shall carry an interest rate of 12% per annum/year.

The Law Offices of Anthony J. Peraica & Associates, Ltd. has no obligation to perform any services other than specifically stated above and Client(s) agrees to prepay all costs, including but not limited to those listed above. If litigation is required to collect unpaid balances, client shall also be responsible and liable for attorney fees and costs of collection and/or litigation.

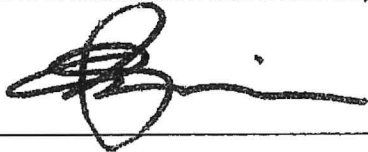
Client(s) acknowledges that no guarantees or promises have been made and the Law Offices of Anthony J. Peraica & Associates, Ltd.'s sole obligation is to provide the aforementioned legal services in a professional and efficient manner. Down payments/initial retainers are absolutely not refundable.

Dated this 30th day of November, 2022

CLIENT(S)

ANTHONY J. PERAICA & ASSOCIATES, LTD.

X
Roger Romanelli



ADDRESS: 4406 Madison St.
Hillside, IL 60142

CONTACT INFO:

HOME PHONE NO. _____

WORK PHONE NO. _____

CELL PHONE 1: 773-531-6370

CELL PHONE 2: _____

EMAIL 1: hillsideforward@gmail.com

EMAIL 2: _____

MAILING ADDRESS (IF DIFFERENT):

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

FILED
10/9/2024 4:28 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
20231120674
Courtroom, 1112
29721870

Anthony J. Peraica & Associates, Ltd.,
an Illinois Corporation,

Plaintiff,

vs

Roger Romanelli,

Defendant.

Case No. 23-M1-120674

PLAINTIFF'S MOTION FOR SERVICE BY SPECIAL ORDER OF THE COURT

NOW COMES Plaintiff, Anthony J. Peraica & Associates, Ltd., ("Plaintiff"), by and through its attorneys, Anthony J. Peraica & Associates, Ltd., pursuant to 735 ILCS 5/12-203.1, requesting service by special order of the court in the above-referenced action, and in support of the herein motion, states as follows:

1. That the Plaintiff filed its Complaint for the herein case against Defendant Roger Romanelli ("Defendant") on September 9, 2023.

2. That, on October 17, 2023, the Sheriff of Cook County attempted unsuccessfully to serve the Defendant, stating he had moved. A copy of the non-service notice from the Cook County Sheriff's website is attached hereto as Exhibit A.

3. On November 13, 2023, Judge Maria M. Barlow entered an order appointing Gary Olson ("Olson") as Special Process Server. A copy of said Order is attached hereto as Exhibit B.

4. From November 13, 2023 to December 11, 2023, Olson conducted skip tracing and other investigations, attempting to locate the whereabouts of the Defendant.

5. After locating one address in downtown Chicago, the attempt to serve the Defendant there was unsuccessful in that the address turned out to be a UPS store where the Defendant purportedly had rented a mailbox. Olson's Affidavit of Non-Service dated December 11, 2023 detailing the unsuccessful attempt is attached as Exhibit C.

6. Olson conducted further investigation, conducting additional skip tracing and located an address for the Defendant at 4406 Madison Street in Hillside, Illinois ('the Hillside address'). The skip trace confirmed this address as the Defendant's residence.

7. Olson also found a car parked in the driveway at the Hillside address. Running a trace of the Illinois license plate number on this car in the driveway, Olson discovered it is registered to the Defendant.

7. Olson further located a phone number for the Defendant in a skip trace. After further attempts at service to the Defendant by knocking on his door, and observing the Defendant's car in the driveway and lights on inside the residence, Olson called the Defendant on March 25, 2024. He spoke with a male who identified as the Defendant, and who used several curse words directed to Olson before hanging up.

8. From March 24 through April 13, 2024, Olson conducted hours of surveillance on the Defendant's residence, and attempted personal service no fewer than six (6) times, all unsuccessful. Most of Olson's attempts occurred when the Defendant's car was parked in the driveway and lights were on inside the residence. Olson could hear noise and movement inside the residence, but the Defendant refused to answer the door.

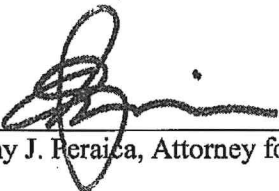
9. Through a multitude of service attempts, Olson noted the outside of the Defendant's residence, the Hillside address, covered with security cameras. It is clear the Defendant monitors the property when home and refuses to open the door for anyone. A copy of Olson's Affidavit of Non-Service filed on April 24, 2024 detailing his many service attempts, surveillance and lone telephone conversation with the Defendant, is attached hereto as Exhibit D.

7. For the above reasons, and for those detailed in the Sheriff's and Olson's affidavits attached to this motion as exhibits A, C and D, normal service on the Defendant is impractical, now and in the future.

WHEREFORE, Plaintiff requests that this Honorable Court enter an Order granting Service by Special Order of the Court pursuant to statute, and allowing service to be made in a manner consistent with due process, which shall include:

- A. Mailing copies of the summons and complaint by first-class mail and Federal Express 3-day shipping and to the Defendant's known address, with proof of the Federal Express delivery presented to the Court as proof of service;
- B. Posting the same on the front door of the Defendant's known address, with photographs of such posting to be presented to the Court as proof of service, and
- C. For such other and further relief as this Honorable Court should determine appropriate.

Respectfully submitted,


Anthony J. Peraica, Attorney for Plaintiff

Anthony J. Peraica & Associates, Ltd.
5130 South Archer Avenue
Chicago, Illinois 60632
773-735-1700
Attorney No.: 54011
support@peraica.com

Filer Selected Hearing Date: 10/25/2024 2:00 PM - 2:05 PM
Location: <<CourtRoomNumber>>
Judge: Courtroom 1112
System Generated Hearing Date: <<CmsHearingStart>>
Location: <<CmsHearingResource="Location">>
Judge: <<CmsHearingResource="JudicialOfficer">>

SHERIFF'S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE

FILED
10/9/2024 4:28 PM
IRIS Y. MARTINEZ
CLERK
COOK COUNTY, IL
20231120674
Courtroom, 1112

CASE NUMBER: 20231120674 **SHERIFF NUMBER:** 20042922 **MULT. SER.:** 1 **DOC TYPE:** SUMMONS
DIE DATE: 10/23/2023 **RECEIVED DATE:** 09/22/2023 **FILED DATE:** 09/19/2023 **DIST:** 162
DEFENDANT: ROMANELLI, ROGER **PLAINTIFF:** ANTHONY J PERAICA & ASSOCIATES, LTD.
ADDRESS: 4406 MADISON **ATTORNEY:** PERAICA AND ASSOCIATES, LTD.
CITY: HILLSIDE **ADDRESS:** 4406 S ARCHER AVE
STATE: IL **ZIP CODE:** 60162 **CITY:** CHICAGO
ATTACHED FEE AMT: **STATE:** IL **ZIP CODE:** 60632
SERVICE INFORMATION:

I CERTIFY THAT I SERVED THE DEFENDANT/RESPONDENT AS FOLLOWS:

- ☐ **(1) PERSONAL SERVICE:** BY LEAVING A COPY OF THE WRIT/ORDER WITH THE DEFENDANT/RESPONDENT PERSONALLY, AND INFORMING DEFENDANT/RESPONDENT OF CONTENTS.
- ☐ **(2) SUBSTITUTE SERVICE:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT AT THE DEFENDANT'S USUAL PLACE OF ABODE WITH A FAMILY MEMBER OR PERSON RESIDING THERE, 13 YEARS OR OLDER, AND INFORMING THAT PERSON OF THE CONTENTS OF THE SUMMONS. ALSO, A COPY OF THE SUMMONS WAS MAILED TO THE DEFENDANT AT HIS OR HER USUAL PLACE OF ABODE ON THE DAY OF 20.
- ☐ **(3) UNKNOWN OCCUPANTS:** BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT NAMING "UNKNOWN OCCUPANTS" WITH A PERSON OF THE AGE OF 13 OR UPWARDS OCCUPYING SAID PREMISE.
- ☐ **(4) CORP/CO/BUS/PART:** BY LEAVING THE APPROPRIATE NUMBER OF COPIES OF THE SUMMONS, COMPLAINTS, INTERROGATORIES, JUDGMENTS, CERTIFICATIONS AND NOTICES WITH THE REGISTERED AGENT, AUTHORIZED PERSON OR PARTNER OF THE DEFENDANT CORPORATION COMPANY BUSINESS PARTNERSHIP
- ☐ **(5) PROPERTY RECOVERED:** NO ONE PRESENT TO RECEIVE ORDER OF COURT. ORDER POSTED IN PLAIN VIEW.
- ☐ **(6) S.O.S/D.O.I.:** BY LEAVING THE SUMMONS AND COMPLAINT WITH THE SECRETARY OF THE STATE/DIRECTOR OF INSURANCE OF THE STATE OF ILLINOIS, AN AGENT OF SAID DEFENDANT LISTED ABOVE. ANY AGENT OF SAID CORPORATION NOT FOUND IN THE COUNTY OF COOK.
- ☐ **(7) CERTIFIED MAIL**
- **** COMPLETE THIS SECTION IF WRIT IS A THIRD PARTY CITATION/GARNISHMENT ****
- ☐ **(8) AND BY MAILING ON THE** **DAY OF** **20** **A COPY OF THE THIRD PARTY GARNISHMENT/CITATION SUMMONS AND NOTICE TO THE JUDGMENT DEBTOR'S LAST KNOWN ADDRESS AS INDICATED IN THE NOTICE WITHIN (2) BUSINESS DAYS OF SERVICE UPON GARNISHEE/THIRD PARTY DEFENDANT.**

THE NAMED DEFENDANT WAS NOT SERVED FOR THE GIVEN REASON BELOW:

- | | | |
|--|---|--|
| ☐ (01) NO CONTACT | ☐ (05) WRONG ADDRESS | ☐ (09) DECEASED |
| ☒ (02) MOVED | ☐ (06) NO SUCH ADDRESS | ☐ (10) NO REGISTERED AGENT |
| ☐ (03) EMPTY LOT | ☐ (07) EMPLOYER REFUSAL | ☐ (11) OUT OF COOK COUNTY |
| ☐ (04) NOT LISTED | ☐ (08) CANCELLED BY PLAINTIFF ATTY | ☐ (12) OTHER REASON (EXPLAIN) |

EXPLANATION: VACANT HOUSE

WRIT SERVED ON: _____
SEX: _____ **RACE:** _____ **AGE:** _____
THIS 17 **DAY OF** Octobe 20 23
TIME: _____

ATTEMPTED SERVICES		
Date	Time	Star #
09/27/2023	17:15:00	# 11582

THOMAS J. DART,
SHERIFF, BY: /s/ LOPEZ, WILLIAM #11637 , DEPUTY

EX A



SHERIFF'S OFFICE OF COOK COUNTY
AFFIDAVIT OF SERVICE

CASE NUMBER: 20231120674 SHERIFF NUMBER: 20042922 MULT. SER.: 1 DOC. TYPE: SMMNS
DIE DATE: 10/23/2023 RECEIVED DATE: 09/22/2023 FILED DATE: 09/19/2023 DIST: 162

Date	Time	Star #
09/27/2023	17:15:00	# 11582

10/23

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

Anthony J. Peraica & Associates, Ltd.,
An Illinois Corporation,

Plaintiff,

vs

ROGER ROMANELLI,

Defendant.

Case No. 23-M1-120674

ORDER

This matter coming up before this Court on status and on Plaintiff's Motion to Appoint Special Process Server, due notice having been given and the Court being advised in the premises,

IT IS HEREBY ORDERED:

1. That GARY OLSON of CHICAGOLAND PROCESS SERVERS, INC., License #117.001600 is hereby appointed as special process server.
2. That GARY OLSON of CHICAGOLAND PROCESS SERVERS, License #117.001600 or any of his employees over the age of 18, is hereby permitted to serve Alias Summons filed with the herein case.
3. Alias Summons is permitted to issue *instante*.
4. The November 16, 2023 Court date is stricken.

ENTERED:


Judge Date

Anthony J. Peraica & Associates, Ltd.
Attorneys for Plaintiff
5130 S. Archer Avenue
Chicago, Illinois 60632
Atty. Code No.: 54011
support@peraica.com


Judge Maria M. Barlow
NOV 13 2023
Circuit Court - 2318

EX. B

iller Selected Hearing Date: No hearing scheduled
ocation: <<CourtRoomNumber>>
udge: Courtroom, 1112
ystem Generated Hearing Date: 1/9/2024 9:30 AM
ocation: Court Room 1112
udge: Johnson, Sarah Redak

AFFIDAVIT OF NON-SERVICE

FILED
12/13/2023 1:48 PM

Case: 23M1120674	Court: State of Illinois, Circuit court Cook County	County:	Job: 10036866	IRIS Y. MARTINEZ CIRCUIT CLERK COOK COUNTY, IL 20231120674 Courtroom, 1112 25584607
Plaintiff / Petitioner: Anthony J. Peralca & Associates, Ltd., an Illinois corp		Defendant / Respondent: Roger Romanelli		
Received by: Kurt Sederman		For: Anthony J. Peralca & Assoc., Ltd.		
To be served upon: Roger Romanelli				

Kurt Sederman, being first duly sworn on oath, deposes and states the following: I am over the age of 18 and not a party to this action. I am licensed under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004.

Recipient Name / Address: Roger Romanelli, 917 West Washington Street, Chicago, IL 60602

Manner of Service: Non-Service

Documents: Alias Summons; Complaint at Law for Breach of Contract; Exhibits, AJP v. ROMANELLI - Exhibit A - FILED.pdf, AJP v. ROMANELLI - Exhibit B - FILED.pdf, AJP v. ROMANELLI - Exhibit C - FILED.pdf, AJP-ROMANELLI - Alias SUM Summons - FILED.pdf

Additional Comments:

1) Unsuccessful Attempt: Dec 11, 2023, 12:04 pm CST at 917 West Washington Street, Chicago, IL 60602
This Is The UPS Store.

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 as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.



12/11/2023

Kurt Sederman

Date

Chicagoland Process Services
10359 S. Pulaski
Chicago, IL 60655

EX C

Filer Selected Hearing Date: No hearing scheduled
Location: <<CourtRoomNumber>>
Judge: Courtroom, 1112
System Generated Hearing Date: 5/10/2024 9:30 AM
Location: Court Room 1112
Judge: Johnson, Sarah Rodak

AFFIDAVIT OF NON-SERVICE

FILED
4/24/2024 4:35 PM
IRIS Y. MARTINEZ

Case: 23M120674	Court: State of Illinois, Circuit court Cook County	County:	Job: 10917642	CIRCUIT CLERK COOK COUNTY IL 20231120674 Courtroom, 1112 27412142
Plaintiff / Petitioner: Anthony J. Peralca & Associates, Ltd., an Illinois corp		Defendant / Respondent: Roger Romanelli		
Received by: Chicagoland Process Services		For: Anthony J. Peralca & Assoc., Ltd.		
To be served upon: Roger Romanelli				

Gary Olson, being first duly sworn on oath, deposes and states the following: I am over the age of 18 and not a party to this action. I am licensed under the Private Detective, Private Alarm, Private Security, Fingerprint Vendor, and Locksmith Act of 2004.

Recipient Name / Address: Roger Romanelli, 4406 Madison Street, Hillside, IL 60162
Manner of Service: Non-Service
Documents: Third Alias Summons; Complaint at Law For Breach of Contract; Exhibits

Additional Comments:

- 1) Unsuccessful Attempt: Mar 22, 2024, 7:52 am CDT at 4406 Madison Street, Hillside, IL 60162
Defendants vehicle parked in driveway. Chevy Aveo ; Illinois License plate ending in 2366. No answer at the front door. No answer at rear door. Security cameras were visible in the side window on the east side of the home.
- 2) Unsuccessful Attempt: Mar 23, 2024, 7:51 pm CDT at 4406 Madison Street, Hillside, IL 60162
No answer at the side door. Defendants' vehicle parked in driveway. The lights were on. Movement could be heard inside. Someone was home but would not come to the door.
- 3) Unsuccessful Attempt: Mar 25, 2024, 3:00 pm CDT at 4406 Madison Street, Hillside, IL 60162
I called the defendant on his cell phone - (773) 531-6370. A male identified himself as Roger Romanelli. I identified myself as a Private Detective for the State of IL and explained that I had legal documents to serve upon him. Mr. Romanelli rudely interrupted me and stated the following, "Do you want my email". I explained that I could not email the documents and the documents had to be served upon himself or a family member above the age of 13 years old. He then stated, "Do you want my F - ing email". I said yes and he replied, "Go F Yourself". He then hung up on me.
- 4) Unsuccessful Attempt: Mar 26, 2024, 7:30 am CDT at 4406 Madison Street, Hillside, IL 60162
1 and ½ -hour Surveillance by Gary Olson - Defendants vehicle parked in driveway. Chevy Aveo Bearing IL License Plate # N86-2366. No answer at door
- 5) Unsuccessful Attempt: Mar 29, 2024, 3:30 pm CDT at 4406 Madison Street, Hillside, IL 60162
- No answer at the front and rear door. No vehicle present.
- 6) Unsuccessful Attempt: Apr 1, 2024, 8:21 am CDT at 4406 Madison Street, Hillside, IL 60162
No answer
- 7) Unsuccessful Attempt: Apr 5, 2024, 9:01 pm CDT at 4406 Madison Street, Hillside, IL 60162
Lights on inside. No answer. I could hear movement inside. Someone was home and would not answer.
- 8) Unsuccessful Attempt: Apr 7, 2024, 9:21 am CDT at 4406 Madison Street, Hillside, IL 60162
No answer, No vehicles present
- 9) Unsuccessful Attempt: Apr 13, 2024, 9:24 pm CDT at 4406 Madison Street, Hillside, IL 60162
No answer. Vehicle parked in Driveway

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 as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.



04/24/2024

EXHIBIT D

FILED DATE: 10/9/2024 4:28 PM 20231120674
FILED DATE: 4/24/2024 4:35 PM 20231120674

Gary Olson
117.001600

Date

Chicagoland Process Services
10359 S. Pulaski
Chicago, IL 60655
773-908-2418

FILED DATE: 10/9/2024 4:28 PM 20231120674
FILED DATE: 4/24/2024 4:35 PM 20231120674

**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT – MUNICIPAL DIVISION**

FILED
9/19/2023 3:49 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
20231120674
Courtroom, 1112
24439122

Anthony J. Peraica & Associates, Ltd.,)
An Illinois Corporation,)
 Plaintiff,)
)
v.)
)
ROGER ROMANELLI,)
 Defendant.)

20231120674

COMPLAINT AT LAW FOR BREACH OF CONTRACT

NOW COMES PLAINTIFF, Anthony J. Peraica & Associates, Ltd., by and through its attorneys, Anthony J. Peraica & Associates, Ltd., and in support of its COMPLAINT AT LAW against Defendant, ROGER ROMANELLI, states as follows:

1. On November 30, 2022, Defendant, ROGER ROMANELLI, (“Defendant”) retained the services of Plaintiff Anthony J. Peraica & Associates, Ltd. (“Plaintiff”) as his attorneys to represent him in a Discrimination case in the Chancery Division in the County Department that, when filed, was captioned as ROGER ROMANELLI v. VILLAGE OF HILLSIDE, Case No.: 2023 CH 02408 in the Circuit Court of Cook County, Illinois. A copy of Retainer Agreement is attached hereto as Exhibit A.
2. Upon retention, Defendant agreed to pay Plaintiff an initial retainer in the amount of \$5,000.00, of which Defendant paid a total of \$5,000.00.
3. During the course of Plaintiff’s representation of Defendant, Plaintiff provided services and incurred costs that exceeded all retainers paid by Defendant. An Affidavit signed by Plaintiff detailing his services to and costs incurred on behalf of Defendant is attached hereto as Exhibit B.
4. Defendant has failed to pay the amount due and owing as stated in Exhibit B to Plaintiff.

WHEREFORE, Plaintiff Anthony J. Peraica & Associates, Ltd., prays that this Honorable Court enter a judgment in the amount of \$4,741.07 against Defendant, ROGER ROMANELLI, plus the costs of filing the instant case, and for such other relief that this Honorable Court deems equitable and just.

**COUNT I – FRAUD
ROGER ROMANELLI**

NOW COMES PLAINTIFF, Anthony J. Peraica & Associates, Ltd., (hereinafter “Plaintiff”) by and through its attorneys, Anthony J. Peraica & Associates, Ltd., and in support of COUNT II of its COMPLAINT AT LAW against Defendant, ROGER ROMANELLI (hereinafter “ROMANELLI”), alleges and states as follows:

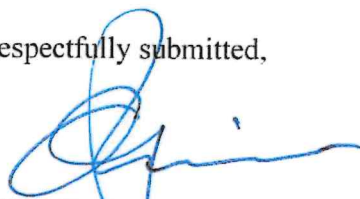
5. Plaintiff realleges Paragraphs 1 through 4 as Paragraph 5 of COUNT I as though recited verbatim herein.
6. On August 2, 2023, in a scheme to defraud Plaintiff, ROMANELLI issued and delivered check number 4405 (Exhibit C) upon a depository, Republic Bank, for the payment of \$5,000.00 to Anthony J. Peraica & Associates, Ltd. (hereinafter, the “check”).
7. ROMANELLI issued and delivered the check to pay for the labor, services, and costs of Anthony J. Peraica & Associates, Ltd.
8. In doing so, ROMANELLI represented that the check would be honored by the depository.
9. In doing so, ROMANELLI intended Plaintiff to credit his balance in the amount of the check and continue providing labor and services under the retainer agreement.
10. Plaintiff relied on ROMANELLI’s representation in that it deposited the check.

11. At the time of issuance and delivery, however, ROMANELLI knew that the check would not be paid by the depository as he had requested a stop payment on the check.

12. As a result, ROMANELLI's account with Plaintiff is still due and owing, and Plaintiff incurred a \$25.00 returned check fee.

WHEREFORE, Plaintiff, Anthony J. Peraica & Associates, Ltd., prays that this Honorable Court enter a judgment in its favor and against Defendant, ROGER ROMANELLI, for an award of compensatory damages in an amount to be proven at trial, an award of punitive damages, an award of attorney's fees and costs, and for such other and further relief this court deems just and equitable.

Respectfully submitted,



Anthony J. Peraica

Anthony J. Peraica
Anthony J. Peraica & Associates, Ltd.
5130 S. Archer Avenue
Chicago, IL 60632
773-735-1700
support@peraica.com
Atty. No.: 54011

