

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

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In Re: The Matter of)
Protective Parking Service)
Corporation, d/b/a)
Lincoln Towing Service,)
Respondent) DOCKET NO. 92 RTV-R
Sub 17 100139 MC,
Hearing on Fitness to hold a)
Commercial Vehicle; Relocater's)
License Pursuant to Section 401 of)
the Illinois Commerce Relocation)
of Trespassing Vehicles Law,)
625 ILCS/18A-401(a))

REPORT OF PROCEEDINGS had at the
hearing on July 7, 2017 at the hour of 9:00 a.m.
pursuant to notice, in the Office of the Illinois
Commerce Commission, 160 North LaSalle Street, 8th
Floor, Chicago, Illinois before Administrative Law
Judge, Latrice Kirkland-Montague.

1 APPEARANCES:

2 MR. BENJAMIN BARR

3 Illinois Commerce Commission

4 160 North LaSalle Street

5 Suite 800

6 Chicago, Illinois 60601

7 Phone: 312-814-2859

8 appeared on behalf of the Illinois Commerce Commission

9

10 MR. KEVIN PERL

11 MR. VLAD CHIRICA

12 Perl & Goodsnyder

13 14 North Peoria Street

14 Chicago, Illinois 60607

15 Phone: 312-243-4500

16 appeared on behalf of Lincoln Towing

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I N D E X

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2	WITNESS	DIRECT	CROSS
3	Timothy Sulkowski		
4	Examination by Mr. Barr	577	
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P R O C E E D I N G S

1
2 ALJ MONTAGUE: By the powers invested in me by
3 the State of Illinois and the Commerce Commission, 92
4 RTV-Sub-17 100139 MC for hearing. This is the hearing
5 on the fitness to hold a Commercial Vehicle Relocator's
6 License for Protective Parking Service Corporation
7 doing business as Lincoln Towing Service. May I have
8 appearances, please? Let's start with the staff.

9 MR. BARR: Good morning, your Honor, Benjamin
10 Barr. I'm appearing on behalf of the staff of the
11 Illinois Commerce Commission, 160 North LaSalle Street,
12 Suite 800, Chicago, Illinois 60601. Telephone is
13 312-814-2859.

14 MR. PERL: Good morning, Kevin Perl, P-E-R-L
15 Perl & Goodsnyder, 14 North Peoria Street, Chicago,
16 Illinois 60607, 312-243-4500 representing Protective
17 Service Corporation doing business as Lincoln Towing.

18 MR. CHIRICA: Good morning, your Honor, Vlad
19 Chirica representing Protective Service Corporation
20 doing business as Lincoln Towing Service, 14 North
21 Peoria Street, Suite 2C, Chicago, Illinois 60607 and
22 phone number is 312-243-4500.

23 ALJ MONTAGUE: Mr. Barr, I'll give you the
24 floor and you can continue with your direct

1 examination.

2 (WITNESS SWORN)

3 TIMOTHY SULIKOWSKI

4 recalled as a witness herein, after having been
5 previously sworn, was examined and testified as
6 follows:

7 DIRECT EXAMINATION

8 BY MR. BARR:

9 Q Good morning, sir.

10 A Good morning.

11 Q Would you state your name, spelling your
12 last name?

13 A Sure. Timothy Sulikowski,
14 S-U-L-I-K-O-W-S-K-I.

15 Q You are aware that you are still under
16 oath?

17 A Correct.

18 Q I'm going to ask you to turn to Page 1 of
19 Exhibit A. Are you on Exhibit A, Mr. Sulikowski?

20 A Yes.

21 Q What do you recognize Page 1 of Exhibit A
22 to be?

23 A It is a printout of the MCIS System containing
24 an address.

1 Q And just quickly flip through the remaining
2 pages of Exhibit A and let me know when you are
3 finished?

4 A Okay.

5 Q Do you recognize the rest of those pages,
6 Sergeant Sulikowski?

7 A Yes.

8 Q And what do you recognize them to be?

9 A A printouts of various addresses of relocation
10 contracts listings through the MCIS system.

11 Q How do you know that they are printouts?

12 A I'm familiar with the way this format looks.

13 MR. BARR: Your Honor, at this time I would
14 move to enter into evidence what is marked as Exhibit
15 A, the certified record from the Motor Carrier
16 Information System.

17 MR. PERL: Based on a lack of foundation by
18 this witness, I would object. He hasn't laid any
19 foundation what he knows, how he knows and when it was
20 printed. And is he saying that he is familiar with
21 them. I'm looking at them. I'm familiar with them by
22 looking at them, but I couldn't lay a foundation for
23 them.

24 MR. BARR: Sergeant Sulikowski, he uses the

1 MCIS system in the course of his investigatory and
2 police work. He testified that he is familiar with the
3 printout and the MCIS System.

4 MR. PERL: Familiarity with is not how you lay
5 a foundation. I'm familiar. You need to lay a proper
6 foundation if you want to lay it with this witness,
7 stuff like "I printed it out. Here is the dates. I
8 put information in here. I know it is accurate and
9 truthful." He's testified so many times that -- first
10 of all, his testimony wasn't that I think he has never
11 seen these before until this case. He has seen the
12 screen before, but he has never actually printed out
13 anything himself in the history of his employment with
14 the Commerce Commission.

15 ALJ MONTAGUE: The previous hearing the
16 exhibit that he testified, which exhibit --

17 MR. BARR: He previously testified to Exhibit
18 B. That was admitted. And to Exhibit J, I believe.
19 But B was the only exhibit admitted.

20 ALJ MONTAGUE: If I recall correctly, that was
21 admitted with a certification or --

22 MR. PERL: While I would love to reargue them,
23 but because there was a certification from --

24 MR. BARR: There is a certification attached

1 to the back as well.

2 MR. PERL: If they are looking for admission
3 based on foundation from Sergeant Sulikowski, I would
4 renew my objection, because that would be admitting
5 that he actually has a foundation and he admitted that
6 he doesn't.

7 ALJ MONTAGUE: You need to go to the
8 certification and where was that again?

9 MR. BARR: The actual boss version is in
10 Sergeant Sulikowski's boundary. Embossment shows up
11 and you can't at the back of exhibit A.

12 ALJ MONTAGUE: I got you. So similarly to the
13 previous ruling I made regarding Exhibit B, I'm going
14 to allow Exhibit A as a self-authenticated record.

15 MR. PERL: It is not based upon Sergeant
16 Sulikowski's foundation or testimony. It is solely
17 on the fact that there was a certification from an
18 individual named Scott Morris.

19 ALJ MONTAGUE: So noted.

20 MR. BARR: Thank you, your Honor.

21 BY MR. BARR:

22 Q Now, I'm going to show you what has been
23 marked as Exhibit K. It is the same exhibit, just
24 the binding.

1 ALJ MONTAGUE: Which one now?

2 MR. PERL: Can I have just one moment? I want
3 to take these out of here. Thank you, Judge.

4 MR. BARR: Thank you, your Honor.

5 BY MR. BARR:

6 Q Exhibit K is Bates attached as five leading
7 zeros and Number 1 all the way to the three zeros
8 and the number 671. So Bates stamped to 671.

9 Sir, do you recognize what is marked as
10 Exhibit K?

11 A Yes.

12 Q What do you recognize it to be?

13 A Lincoln Towing 24-hour tow sheets.

14 Q Were these the same documents that you
15 testified at previous hearings that you were at on
16 April 28th when you performed your review?

17 A Yes.

18 Q Are these the sheets that you looked
19 through when you typed the address open radiator
20 Number MCIS?

21 A Yes.

22 Q I want you to turn to Page 2 of Exhibit A.
23 Are you on Page 2, Sergeant Sulikowski?

24 A Yes.

1 Q What address is Exhibit 2 for?

2 A 834 West Leland Avenue in Chicago.

3 Q And according to the MCIS Report that you
4 have in front of you, what is the contractor status
5 for the relevant time period, and just to remind
6 you, the relevant time period is July 24, 2015
7 through March 23rd of 2016?

8 MR. PERL: I might be looking at a different
9 document. Counsel asked what address is Page 2 for and
10 the witness gave an address, but the document that I'm
11 looking at doesn't have that.

12 MR. BARR: You are looking at Exhibit A?

13 MR. PERL: I thought you were at K.

14 ALJ MONTAGUE: I thought you said 2 of K?

15 MR. PERL: He said K and you meant A.

16 ALJ MONTAGUE: Okay, 2 of A.

17 BY MR. BARR:

18 Q Are you on Page 2 of Exhibit A?

19 A Yes.

20 Q And what address is Page 2 of Exhibit A
21 for?

22 A 834 West Leland Avenue in Chicago.

23 Q And according to the MCIS Report, what is
24 the contract status for the relevant time period for

1 that address?

2 A The report shows that a contract was entered
3 and received on 3/24/16.

4 Q Now, what I want you to turn to is Page 352
5 and what has been marked as Exhibit K. Let me know
6 when you are on Page 352. On Page 352 of the
7 Lincoln Tow, what is the date listed on the top?

8 A 11/19 of '15.

9 Q And on Page 352 on November 19, 2015 in the
10 Lincoln Towing log, does 834 West Leland Avenue
11 appear?

12 A Yes.

13 Q I want you to turn your attention to Page
14 393 of Exhibit K?

15 A Okay.

16 Q On Page 392, what is the date listed, date
17 of tow listed on that page?

18 MR. PERL: I think you said 393 the first
19 time.

20 BY MR. BARR:

21 Q On Page 393, Exhibit K, what is the date of
22 the tow listed on that sheet?

23 A 12/3/15.

24 Q On the Lincoln Tow log, does the address

1 834 Leland Avenue appear?

2 A Yes.

3 Q And based on your review of the Lincoln Tow
4 log and the MCIS for 834 Leland, did you reach a
5 conclusion?

6 A Yes.

7 Q And what was your conclusion?

8 A Lincoln Towing did not have a contract entered
9 on that property until 3/24/16.

10 MR. PERL: I would object. It calls for a
11 legal conclusion from this witness. He has been
12 testifying up to now that he has no knowledge, just the
13 screen shot. And now he is reaching a conclusion that
14 they didn't have a contract. Prior he argued and
15 limited testifying to what the screen show. He
16 testified he doesn't know who inputs it. He only knows
17 what the screen shows.

18 ALJ MONTAGUE: We need to recall the language.
19 It has to be related to what the document shows.

20 BY MR. BARR:

21 Q Mr. Sulikowski, in your Lincoln Tow log,
22 what was your conclusion?

23 MR. PERL: Same objection.

24 Q I said according to the MCIS Report, I can

1 rephrase it. And based off -- according to the MCIS
2 printout, what is your conclusion?

3 MR. PERL: So what we did last time was spent
4 20 minutes on this. Narrowing all that he could
5 testify to was what the screen showed. That was it.
6 He testified about a 100 times the screen shows there
7 is no contract entered. Clearly that is what the
8 screen shows, not the conclusion that he drew from it.

9 ALJ MONTAGUE: I think you are trying to do
10 the same thing. But limit -- your testimony should be
11 more in line with what the document shows. We're
12 trying to do the same thing we did the last time.
13 We're trying to get the language right. Go ahead, Mr.
14 Barr.

15 MR. BARR: You want me to reask the question
16 again?

17 ALJ MONTAGUE: Yes, please.

18 BY MR. BARR:

19 Q Sergeant Sulikowski, according to your
20 screen prints that you have in front of you, what
21 was your conclusion?

22 A The report shows that a contract was entered
23 on 3/24 of '16.

24 Q Did you reach any other conclusion based on

1 the 24-hour tow log and the MCIS printout?

2 A I'm not sure how I can answer that.

3 MR. PERL: Here is my objection. There has
4 been no evidence or testimony listed in the deposition.
5 Look at the 24-hour tow sheet. Look at this document.
6 He didn't do an investigation. It can't be a
7 conclusion that he drew other than the screen shot
8 shows what it shows. Information that he didn't input
9 or investigate. That is why the screen shot shows and
10 the report shows, that is what it shows and they move
11 on as opposed to the "did you reach a conclusion".

12 ALJ MONTAGUE: Officer, I think you responded
13 the screen shot shows that there was not a contract on
14 this date.

15 MR. PERL: I have no objection to that.

16 ALJ MONTAGUE: The printout shows that there
17 wasn't a contract on file on the date on the tow log.

18 THE WITNESS: Yes, ma'am.

19 ALJ MONTAGUE: Just so we connect the two.

20 BY MR. BARR:

21 Q Sergeant Sulikowski, can you turn to Page 3
22 of Exhibit A?

23 A I do not have a Page 3 under Exhibit A. It
24 goes -- you know what, it is out of order. Okay, I do

1 have a 3. It is behind 5.

2 Q I'm sorry. What address is that MCIS for?

3 A The address is 850 West Eastwood Avenue in
4 Chicago.

5 Q And according to Page 3 of the MCIS Report,
6 what is the contract status for the relevant time
7 period?

8 A The report shows that there was no contract on
9 file during the relevant time period.

10 Q Now, I would like you to turn to Page 269
11 of Exhibit K.

12 A Okay.

13 Q On Page 269 of Exhibit K, what is the date
14 of the tow listed on that page?

15 A 10/19 of '15.

16 Q On that Page 269, does the address 850 West
17 Eastwood Avenue appear?

18 A Yes.

19 Q Sergeant Sulikowski, I ask you to turn to
20 Page 332.

21 A Okay.

22 Q What is the date of the two listed on Page
23 332?

24 A 1/11/15.

1 Q And on Page 332, 850 West Eastwood Avenue
2 appears?

3 A Yes.

4 Q Now, Sergeant Sulikowski, I ask you to turn
5 to 445?

6 A Okay.

7 Q What is the date of the tow listed on Page
8 445?

9 A 12/22/15.

10 Q And does the address 850 West Eastwood
11 Avenue appear on that page?

12 A Yes.

13 Q Based upon your review of the Lincoln Tow
14 Log and the review of the MCIS Report, 850 West
15 Eastwood Avenue, did you reach a conclusion?

16 MR. PERL: Same objection as to the
17 conclusion. Not as to what the screen shows.

18 MR. BARR: I'm asking based on his review of
19 the tow logs and the MCIS Report. That is -- would be
20 kind of Sergeant Sulikowski how he answered. He hasn't
21 answered whether he's based it on the review or
22 according to the MCIS Report.

23 ALJ MONTAGUE: And it should say, based on the
24 screen shot and the tow log, this is --

1 THE WITNESS: The report shows that there was
2 no contract listed during the relevant time period.

3 BY MR. BARR:

4 Q Sergeant Sulikowski, if I could have you
5 turn to Page 5 of Exhibit A?

6 A Okay.

7 Q What address is on the MCIS Report for?

8 A 1415 West Morse Avenue in Chicago.

9 Q And according to the report that you have
10 in front of you, what is the status for the relevant
11 time period?

12 A The report shows that there is a call contract
13 on file for the relevant time period.

14 Q Sergeant Sulikowski, I'll have you go to
15 Page 6 of Staff Exhibit A.

16 A Okay.

17 Q According to Page 6 of Staff Exhibit A,
18 according to the -- what address is the MCIS Report
19 for?

20 A 1730 West Terra-Cotta place in Chicago.

21 Q And according to the MCIS Report that is in
22 front of you, what is the contract status for the
23 relevant time period?

24 A The report shows that there was a contract on

1 file during a portion of the relevant time period.

2 Q And which re-locator was that lot
3 contracted to?

4 A A report shows that a contract was on file on
5 12/31/15 for Protective Parking Service and then on
6 12/31/15 for Rendered Services.

7 Q Now, I would like you to turn to Page 560
8 of Exhibit K.

9 A Would you repeat that page number?

10 Q 560.

11 A Okay.

12 Q On Page 560 of the tow log, what is the
13 date of the tow?

14 A The date is unreadable by this photocopy.

15 Q On 561, what is the date of tow listed?

16 A 2/6/16.

17 Q And going back to Page 560, does the
18 address 1730 West Terra-Cotta appear?

19 A Yes.

20 Q Now, Sergeant Sulikowski, I want you to
21 turn to Page 625.

22 A Okay.

23 Q Can you read the date on top of 625?

24 A No.

1 Q Could you turn to Page 643.

2 A Okay.

3 Q Read the date on top of Page 643?

4 A No.

5 Q Sergeant Sulikowski, I want you to turn to
6 Page 7 of Staff Exhibit A.

7 A Okay.

8 Q What address is that MCIS Report for?

9 A 2001 West Devon Avenue in Chicago.

10 Q And according to that MCIS Report, what is
11 the contract status for the relevant time period?

12 A According to the report, a contract was
13 entered on 12/14/15.

14 Q And who is that contract for?

15 A Protective Parking Service.

16 Q Now, Sergeant Sulikowski, I want you to
17 turn to Page 6 of Staff Exhibit K.

18 A Okay.

19 Q On Page 6 of the Lincoln tow log, what is
20 the date of the tow listed?

21 A 7/25 of '15.

22 Q And on Page 6, does the address 2001 West
23 Devon appear?

24 A Yes.

1 Q And I want you to turn to Page 18 of
2 Exhibit K. What is the date of the tow listed on
3 Page 18?

4 A 7/31/15.

5 Q And on Page 18, does the address 2001 West
6 Devon appear?

7 A Yes, sir.

8 Q Now, Sergeant Sulikowski, can you turn to
9 Page 37?

10 A Okay.

11 Q Are you able to read the date on Page 37?

12 A No.

13 Q Can you turn to Page 60?

14 A Okay.

15 Q What is the date listed on Page 60?

16 A 8/14/15.

17 Q And on Page 60 and on August 14, 2015 of
18 the Lincoln tow log, does the address 2001 West
19 Devon appear?

20 A Yes.

21 Q Sergeant Sulikowski, can you then turn to
22 Page 72?

23 A Okay.

24 Q What is the date of tow listed on Page 7?

1 A 8/16 of '15.

2 Q And on August 16, 2015, does the address
3 2001 West Devon Avenue appear?

4 A Yes.

5 Q Sergeant Sulikowski, can you please turn to
6 Page 95?

7 A Okay.

8 Q What is the date of tow listed on Page 95,
9 Sergeant Sulikowski?

10 A 8/23/15.

11 Q And on August -- you said August 23, 2015?

12 A Yes.

13 Q On August 23, 2015 on Page 95 does the
14 address 2001 West Devon appear?

15 A Yes.

16 Q Sir, Sergeant Sulikowski, can you turn to
17 Page 115.

18 A Okay.

19 Q What is the date of tow listed on Page 115?

20 A 8/30 of '15.

21 Q And on August 30, 2015 of Page 115, does
22 the address 2001 West Devon appear?

23 A Yes.

24 Q Sergeant Sulikowski, can you turn to Page

1 10?

2 A Okay.

3 Q What is the date of tow listed on Page 130?

4 A I can't make the first couple of digits out.

5 Q Sergeant Sulikowski, can you turn to Page

6 132 then?

7 A Okay.

8 Q Are you able to read the date on Page 132?

9 A No.

10 Q Sergeant, can you turn to Page 143?

11 A Okay.

12 Q Are you able to read the date on Page 143?

13 A No.

14 Q Can you turn to Page 153? Are you able to

15 read the date on Page 153?

16 A No.

17 Q Can you turn to Page 171?

18 A Okay.

19 Q You are able to read the date on Page 171?

20 A No.

21 Q Can you turn to Page 244?

22 A Okay.

23 Q You are able to read the date on Page 244?

24 A Yes.

1 Q What is the date that is on Page 244?

2 A 10/11/15.

3 Q And October 11, 2015 with the Lincoln tow
4 log, does the address 2001 West Devon appear?

5 A Yes.

6 Q Now Sergeant Sulikowski, can you turn to
7 Page 326?

8 A Okay.

9 Q What is the date of tow listed on Page 326?

10 A 1/18/15.

11 Q And on November 8th of 2015, does the
12 address of 2001 West Devon appear?

13 A Yes.

14 Q Based on your review of the Lincoln tow log
15 and the MCIS Report for Devon Avenue, did you reach
16 a conclusion?

17 A Yes.

18 Q And what is your conclusion?

19 A The report shows that a contract for 2001 West
20 Devon was entered and received on 12/14/15.

21 Q Did Lincoln Towing have a contract with
22 that property?

23 MR. PERL: Objection. They have not
24 established that this witness -- it is the opposite.

1 He already testified at his deposition in here it is
2 not what he does. They do not send the contracts to
3 him. He has no way of knowing, unless they would have
4 even asked one question how would you know that. He
5 doesn't get the contracts and doesn't see the
6 contracts. He only saw what he saw on the screen shots
7 that day and this is another way of getting around it.
8 The lack of foundation is the objection.

9 MR. BARR: I'm asking based on his review of
10 Exhibit A, which is the certified records from the
11 Commission database, the MCIS Report Sergeant
12 Sulikowski has in front of him and based on what he
13 just testified as the date whether Lincoln Towing or
14 Protective Parking Services Corporation had a contract
15 based on those reports at the time.

16 MR. PERL: On several of the days he couldn't
17 tell the date. Based upon these dates, they have a
18 contract. Some of the dates don't show up. He
19 wouldn't know. The other one is lack of foundation.
20 He has no way of knowing whether or not there was a
21 contract. They don't send the contracts to him and he
22 doesn't review the contracts. All Sergeant Sulikowski
23 knows is what the screen shot shows. It doesn't show
24 that. It shows -- and I'll get to my cross, it is a

1 white piece of paper with black lettering that he can't
2 tell you is from the screen shot at all. He has no
3 idea whether or not -- I would love Counsel to know,
4 would you know, because he doesn't know. So there is a
5 lack of foundation.

6 ALJ MONTAGUE: So to avoid the answer and I
7 think it is just the wording has to be accurate and the
8 answer can be based on -- based on a review of the tow
9 logs and based on the screen shot, there was not a
10 contract on file.

11 MR. BARR: That is exactly what my question
12 was.

13 MR. PERL: That wasn't the question, I
14 wouldn't object to that. The question is, did you draw
15 a conclusion from that. Based upon the screen not and
16 the 24-hour tow sheet, it is not independent knowledge.

17 ALJ MONTAGUE: I need to look at the
18 transcript. If you could avoid the word "conclusion".
19 Based on the screen shot, what, you know.

20 MR. BARR: My question was based on your
21 review of the Lincoln Tow Log and the MCIS Report, did
22 you reach a conclusion?

23 MR. PERL: If you could read back the
24 question. Did he have a contract on file? That was

1 the initial question that I objected to.

2 ALJ MONTAGUE: Well, let's go back. That is
3 the question you asked, the last one is better.

4 BY MR. BARR:

5 Q Based on your review of the Lincoln Tow Log
6 and according to your review of the MCIS Report for
7 the address 2001 Devon Avenue, did you reach a
8 conclusion?

9 A According to the report and the tow sheets,
10 there was not a contract on file during those dates.

11 Q Thank you, Sergeant Sulikowski.

12 Sergeant Sulikowski, if I could have you
13 turn to Page 10 of Exhibit A.

14 A Okay.

15 Q What address is that MCIS Report for?

16 A 2626 North Lincoln Avenue in Chicago.

17 Q And according to the MCIS Report, what is
18 the contract status for the relevant time period for
19 that address?

20 A The report shows that a contract was entered
21 against that address on 12/7/16.

22 Q Who is the re-locator that has that
23 contract during that time period?

24 A Protective Parking Services.

1 Q Now, Sergeant Sulikowski, can you turn to
2 Page 36 of Exhibit K.

3 A Okay.

4 Q You are able to read the Page on 36?

5 A Yes.

6 Q What is the date of tow listed on Page 36?

7 A 8/6/15.

8 Q And on August 6, 2015 does the address 2626
9 North Lincoln Avenue, appear?

10 A Yes.

11 Q And based on your review of the Lincoln Tow
12 Log and the MCIS Report in front of you, 2626 North
13 Lincoln Avenue, did you reach a conclusion?

14 A The report shows that according to the Tow Log
15 and the report, there was not a contract entered on
16 that date.

17 Q Can you turn to Page 11 of Staff Exhibit A?

18 A Okay.

19 Q What address is listed on Page 11 of
20 Exhibit A?

21 A 2801 West Devon Avenue in Chicago.

22 Q And according to the MCIS Report in front
23 of you, what is the contract status for the relevant
24 time period?

1 A The report shows that a contract was entered
2 on 3/7/07 and canceled on 3/1 of '08.

3 Q During the relevant time period, was that
4 address assigned to any re-locator?

5 A The report shows that there was not a contract
6 on file for any re-locator during that relevant time
7 period.

8 Q Now, Sergeant Sulikowski, can you turn to
9 Page 24 of Exhibit K. According to Page 24 of
10 Exhibit K, what was the date of tow

11 A 8/1 of '15.

12 Q On August 1, 2015, does the address 2801
13 West Devon appear?

14 A Yes.

15 Q Can you turn to Page 61 of the same
16 exhibit, Exhibit K.

17 A Okay.

18 Q What is the date of tow listed on Page 61?

19 A 8/15/16.

20 Q And August 15, 2016, does the address 2801
21 West Devon appear?

22 A Yes.

23 MR. PERL: Object as to relevance. The time
24 period. Are we on Page 61?

1 MR. BARR: 61.

2 BY MR. BARR:

3 Q Sergeant Sulikowski, can you go to --

4 MR. PERL: Make sure I'm not confused. The
5 relevant time period we're looking at is from July 2015
6 to March of 2016.

7 MR. BARR: That is correct.

8 MR. PERL: This is a tow from August of 2016.
9 We're limited in scope to those dates.

10 MR. BARR: Those are the records and if you
11 look at what has been Bates stamped as 62, they are
12 sequential order and it looks like someone put the
13 wrong year on it.

14 MR. PERL: I'm going basically on the witness'
15 testimony. This is the document that the witness
16 looked at allegedly.

17 ALJ MONTAGUE: I'll sustained your objection.

18 MR. BARR: I'll move on your Honor.

19 BY MR. BARR:

20 Q Sergeant Sulikowski, can you turn to 62.

21 A Okay.

22 Q What is the date of tow listed on Page 62.

23 A The top half of the first number is cut off on
24 the photocopy.

1 Q Can you turn to the Page 63?
2 A Okay.
3 Q You are able to read the date on Page 63?
4 A Not clearly.
5 Q Can you read it at all?
6 A I can read portions of it.
7 Q What can you see on Page 63?
8 A It appears to be the year '15.
9 Q Sergeant Sulikowski, can you turn to Page
10 67?
11 A Okay.
12 Q You want to read the date of tow on Page
13 67.
14 A Yes.
15 Q What is the date of tow?
16 A 8/15 of '15.
17 Q And on August 15, 2015, does the address
18 2801 West Devon appear?
19 A Yes.
20 Q How many times?
21 A Twice.
22 Q Sergeant Sulikowski, can you now turn to
23 Page 85. What is the date of tow listed on Page 85?
24 A 8/21/15.

1 Q And August 21st of 2015, does the address
2 of 2801 West Devon appear?

3 A Yes.

4 Q Can you turn to Page 117?

5 A Okay.

6 Q You are able to read the date on Page 117?

7 A Partially.

8 Q What can you read?

9 A The day of 31 and the year of 15.

10 Q And does the address 2801 West Devon appear
11 on Page 117?

12 A Yes.

13 Q Can you now turn to Page 120?

14 A Okay.

15 Q Are you able to read the date on Page 120?

16 A Partially.

17 Q What can you read?

18 A The day of 1 and the year of '15.

19 Q And does the address 2801 West Devon appear
20 on that page?

21 A Yes.

22 Q Sergeant Sulikowski, can you go to Page
23 164, please?

24 A Okay.

1 Q What is the date of tow listed on Page 164?

2 A 9/16/15?

3 Q And on September 16th of 2015 does the
4 address 2801 West Devon appear?

5 A Yes.

6 Q Sergeant Sulikowski, can you turn to Page
7 197 for me, please?

8 A Okay.

9 Q What is the date of tow listed on Page 197?

10 A 9/26/15.

11 Q Does the address 2801 West Devon appear on
12 that page?

13 A Yes.

14 Q Sergeant Sulikowski, can you now turn to
15 Page 199?

16 A Okay.

17 Q What is the date of tow listed on Page 199?

18 A 9/27 of '15.

19 Q And does the address 2801 West Devon
20 appear?

21 A Yes.

22 Q Now, Sergeant Sulikowski, can you please
23 turn to Page 224?

24 A Can you repeat the page number?

1 Q 224.

2 A Okay. I'm there.

3 Q Can you read the date on 224?

4 A Yes.

5 Q And what is the date of tow on that page?

6 A 10/6/15.

7 Q On Page 224 does the address 2801 West

8 Devon appear?

9 A Yes.

10 Q Now, Sergeant Sulikowski, can you please
11 turn to Page 227?

12 A Okay.

13 Q Are you able to read the date on Page 227?

14 A Yes.

15 Q What is the date listed on Page 227?

16 A 10/7 of '15.

17 Q And does the address 2801 West Devon appear
18 on that page?

19 A Yes.

20 Q Can you please turn to Page 239?

21 A Okay.

22 Q What is the date of tow listed on Page 239?

23 A 10/10/15.

24 Q And does the address 2801 West Devon appear

1 on that page?

2 A Yes.

3 Q How many times?

4 A Twice.

5 Q Now, can you please turn to Page 242?

6 A Okay.

7 Q What is the date of tow listed on Page 242?

8 A 10/11/15.

9 Q And on that page does the address 2801 West
10 Devon appear?

11 A Yes.

12 Q Now, Sergeant Sulikowski, can you please
13 turn to Page 243?

14 A Okay.

15 Q What is the date of tow listed on Page 243?

16 A 10/11/15.

17 Q And on Page 243, does the address 2801 West
18 Devon appear.

19 A Yes.

20 Q Now, Sergeant, can you turn to Page 265?

21 A Okay.

22 Q On Page 265, what is the date of tow?

23 A 10/18/15.

24 Q And on that page does the address 2801 West

1 Devon appear?

2 A Yes.

3 Q Now, Sergeant Sulikowski, can you turn to
4 Page 226?

5 ALJ MONTAGUE: 226?

6 MR. BARR: I'm sorry, 266.

7 THE WITNESS: Okay.

8 BY MR. BARR:

9 Q What is the date of tow listed on Page 266?

10 A 10/18/15.

11 Q On that page does the address 2801 West
12 Devon appear?

13 A Yes.

14 Q And Sergeant Sulikowski can you go to Page
15 267?

16 A Okay.

17 Q What is the date of tow listed on Page 267?

18 A The top of the year is cut off.

19 Q Are you able to make it out at all?

20 A I can guess.

21 Q What do you think it is?

22 MR. PERL: I would object to the witness
23 guessing.

24 ALJ MONTAGUE: Sustained.

1 BY MR. BARR:

2 Q Sergeant Sulikowski, can you turn to Page
3 269.

4 A Okay.

5 Q You want to make out the date of tow on
6 269?

7 A Yes.

8 Q And what is the date of tow on 269?

9 A 10/19/15.

10 Q And does the address 2801 West Devon appear
11 on that page?

12 A Yes.

13 Q Can you turn to Page 301?

14 A Okay.

15 Q What is the date of tow listed on Page 301?

16 A 10/31/15.

17 Q Does the address 2801 West Devon appear?

18 A Yes.

19 Q Now, Sergeant Sulikowski, can you turn to
20 Page 324?

21 A Okay.

22 Q What is the date of tow listed on that
23 page?

24 A 11/8/15.

1 Q And does the address 2801 West Devon
2 appear?

3 A Yes.

4 Q Can you turn to Page 329?

5 A Okay.

6 Q What is the date of tow listed on Page 329?

7 A 11/10/15.

8 Q Does the address 2801 West Devon appear?

9 A Yes.

10 Q Sergeant Sulikowski, can you please turn to
11 Page 338?

12 A Okay.

13 Q What is the date of tow listed on that
14 page?

15 A 1/14 of '15.

16 Q Does the address 2801 West Devon appear on
17 that page?

18 A Yes.

19 Q Sergeant Sulikowski, could you turn to Page
20 348?

21 A 348?

22 Q Correct.

23 A Okay.

24 Q What is the date of tow listed on Page 348?

1 A 11/17 of '15.

2 Q Does the address 2801 West Devon appear?

3 A Yes.

4 Q Now, can you please turn to Page 374?

5 A Okay.

6 Q What is the date of tow listed on Page 374?

7 A 11/26/15.

8 Q Does the address 2801 West Devon appear?

9 A Yes.

10 Q Now, can you please turn to Page 380. What
11 is the date of tow listed on Page 380?

12 A 11/28/15.

13 Q Does the address 2801 West Devon appear on
14 that page?

15 A Yes.

16 Q Can you turn to Page 383?

17 A Okay.

18 Q What is the date of tow listed on Page 383?

19 A 11/29 of '15.

20 Q And on that page does the address 2801 West
21 Devon appear?

22 A Yes.

23 Q Can you turn to Page 384?

24 A Okay.

1 Q What is the date of tow listed on that
2 page?

3 A 11/29 of '15.

4 Q And does the address 2801 West Devon appear
5 on that page?

6 A Yes.

7 Q Now, Sergeant Sulikowski, can you please
8 turn to Page 404?

9 A Okay.

10 Q What is the date of tow listed on that
11 page?

12 A 126 of '15.

13 Q And does the address 2801 West Devon appear
14 on that page?

15 A Yes.

16 Q Turn now to Page 413.

17 A Okay.

18 Q What is the date of tow listed on 413?

19 A 12/11/15.

20 Q And does the address 2801 West Devon appear
21 on that page?

22 A Yes.

23 Q And Sergeant Sulikowski, can you turn to
24 Page 419?

1 A Okay.

2 Q What is the date of tow listed on that
3 page?

4 A 12/12/15.

5 Q And does the address 2801 West Devon
6 appear?

7 A Yes.

8 Q Can you now turn to Page 436?

9 A Okay.

10 Q Are you able to read the date at the top of
11 Page 436?

12 A No.

13 Q Could you turn to Page 441?

14 A Okay.

15 Q What is the date of tow listed on Page 441?

16 A 12/20/15.

17 Q And does the address 2801 West Devon appear
18 on that page?

19 A Yes.

20 Q Now, Sergeant Sulikowski, can you please
21 turn to Page 443?

22 A Okay.

23 Q What is the date of tow on Page 443?

24 A 12/21/15.

1 Q Does the address 2801 West Devon appear on
2 that page?

3 A Yes.

4 Q And Sergeant Sulikowski, can you turn to
5 Page 447?

6 A Okay.

7 Q What is the date of tow listed on that
8 page?

9 A 12/23 of '15.

10 Q Does the address 2801 West Devon appear on
11 that page?

12 A Yes.

13 MR. BARR: I'm sorry, your Honor. Could I
14 have just one minute?

15 ALJ MONTAGUE: Sure.

16 (BRIEF PAUSE)

17 BY MR. BARR:

18 Q Sergeant Sulikowski, can you turn to Page
19 457?

20 A Okay.

21 Q What is the date of tow listed on that
22 page?

23 A 12/29 of '15.

24 Q Does the address 2801 West Devon appear?

1 A Yes.

2 Q Can you please turn to Page 461?

3 A Okay.

4 Q What is the date of tow listed on Page 461?

5 A 12/30/15.

6 Q Does the address 2801 West Devon appear on
7 that page?

8 A Yes.

9 Q Can you turn to Page 464, please?

10 Q What is the date of tow listed on Page 464?

11 A 12/31/15.

12 Q And does the address 2801 West Devon
13 appear?

14 A Yes.

15 Q Can you please turn to Page 472?

16 A Okay.

17 Q What is the date of tow listed on Page 472?

18 A 1/2/16.

19 Q Does the address of 2801 West Devon appear
20 on that page?

21 A Yes.

22 Q Can you now turn to Page 473?

23 A Okay.

24 Q What is the date of tow listed on that

1 page?

2 A 1/2/16.

3 Q And does the address 2801 West Devon
4 appear?

5 A Yes.

6 Q Can you please turn to Page 477?

7 A Okay.

8 Q What is the date of tow according to Page
9 477?

10 A 1/3 of '16.

11 Q And does the address 2801 West Devon
12 appear?

13 A Yes.

14 Q Sergeant Sulikowski, could you turn to Page
15 565?

16 A Okay.

17 Q What is the date of tow listed on that
18 page?

19 A 2/6/16.

20 Q Does the address 2801 West Devon appear on
21 that page?

22 A Yes.

23 Q And based on review of the Lincoln Tow Log
24 and according to the MCIS Report for the address

1 2801 West Devon Avenue, did you reach a conclusion?

2 A The report shows that there was no contract on
3 file during the relevant time period.

4 Q Sergeant Sulikowski, could you please turn
5 to the Page Bates stamped 14 of Exhibit A?

6 A Okay.

7 Q What address is Page 14 for?

8 A 3214 North Kimball Avenue in Chicago.

9 Q And according to the MCIS Report in front
10 of you, what is the contract status for the relevant
11 time period?

12 A The report shows that the contract was entered
13 and received on 8/9/07 and canceled on 2/19/09.

14 Q Who was that contract for?

15 A Protective Parking Services.

16 Q Now, could I have you turn to Page 431 of
17 what has been marked as Exhibit K?

18 A Okay.

19 Q According to Page 471, what is the date of
20 tow?

21 A 12/16 of '15.

22 Q And on that page, do you see the address
23 3214 North Kimball Avenue?

24 A Yes.

1 Q And based on the review of the Lincon Tow
2 Log and according to the MCIS Report in front of
3 you, did you reach a conclusion?

4 A The report shows there was no contract listed
5 during the relevant time period.

6 Q Sergeant Sulikowski, can I please have you
7 turn to Page 15 of Exhibit A?

8 A Okay.

9 Q What address is Page 15 for?

10 A 3620 North Clark Street in Chicago.

11 Q And according to -- what is the contract
12 status for the relevant time period?

13 A According to the report, a contract during the
14 relevant time period is listed to another re-locator.

15 Q Now, Sergeant Sulikowski, can I please have
16 you turn to Page 21 of Exhibit K?

17 A Okay.

18 Q Are you able to read the date on Page 21?

19 A No.

20 Q Can you turn to Page 61 of Exhibit K.

21 A Okay.

22 Q Are you able to read the date on top of
23 that page?

24 A Yes.

1 Q What is the date of tow listed on Page 61?

2 A 8/15 of '16.

3 Q And does the address 3620 North Clark

4 Street appear?

5 A Yes.

6 Q How many times does it appear on that page?

7 A Twice.

8 Q Could you turn to Page 91, please?

9 MR. PERL: Can we go back for one second?

10 MR. BARR: To which page.

11 MR. PERL: Page 61. Can you have the reporter
12 read back the date on the top of Page 61.

13 (WHEREUPON the record was read

14 as follows:

15 "A 8/15 of '16.")

16 MR. PERL: I would object to the relevance on
17 that.

18 ALJ MONTAGUE: Sustained.

19 BY MR. BARR:

20 Q Can you turn to Page 91?

21 A Okay.

22 Q What is the date of tow listed on Page 91?

23 A 8/22 of '15.

24 Q Does the address 3620 North Clark Street

1 appear on that page?

2 A Yes.

3 Q Can you go to Page 151. I'm sorry 150, not
4 151.

5 A I'm on Page 150.

6 Q What is the date of tow listed on Page 150?

7 A 9/12/15.

8 Q Does the address 3620 North Clark Street
9 appear?

10 A Yes.

11 Q And can you go to Page 225?

12 A Okay.

13 Q What is the date of tow listed on Page 225?

14 A 10/6/15.

15 Q And does the address 3620 North Clark
16 Street appear?

17 A Yes.

18 Q Can you please go to Page 227?

19 A Okay.

20 Q What is the date of tow listed on Page 227?

21 A 10/7/15.

22 Q And does the address 3620 North Clark
23 Street appear on that page?

24 A Yes.

1 Q Can you please go to Page 231?

2 A Okay.

3 Q What is the date of the tow listed on that
4 page?

5 A 10/8/15.

6 Q And does the address 3620 North Clark
7 Street appear on that page?

8 A Yes.

9 Q How many times?

10 A Twice.

11 Q Can you go to Page 284 then?

12 A 284.

13 Q Correct. What is the date of tow listed on
14 Page 284?

15 A 10/24/15.

16 Q Does the address 3260 North Clark Street
17 appear on that page?

18 A Yes.

19 Q And could you go to Page 285? What is the
20 date of tow listed on that page?

21 A 10/15 of '15.

22 Q 3620 North Clark Street appears on that
23 page?

24 A Yes.

1 Q Can you now go to Page 380?

2 A Okay.

3 Q What is the date of tow listed on Page 38?

4 MR. PERL: Object to the form of the question.

5 THE WITNESS: 11/28/15.

6 BY MR. BARR:

7 Q Does the address 3620 North Clark Street
8 appear?

9 A Yes.

10 Q And turn to the Page of 402.

11 A Okay.

12 Q What is the date of the tow listed on Page
13 402?

14 A 12/5/15.

15 Q And does the address 3620 North Clark
16 Street appear on that page?

17 A Yes.

18 Q Would you now turn to Page 408?

19 A Okay.

20 Q On Page 408, what is the date of the tow
21 listed?

22 A 12/9/15.

23 Q And does the address 3620 North Clark
24 Street appear?

1 A Yes.

2 Q Can you now please go to Page 414?

3 A Okay.

4 Q What is the date of the tow listed on Page
5 414?

6 A 12/11/15.

7 Q And does the address 3620 North Clark
8 appear on that page?

9 A Yes.

10 Q Can you now please go to Page 452?

11 A Okay.

12 Q What is the date of the tow listed on Page
13 452?

14 A That's unreadable.

15 Q Can you please go to Page 454?

16 A Okay.

17 Q What is the date of the tow listed on Page
18 454?

19 A 12/27/15.

20 Q And does the address 3620 North Clark
21 Street appear on that page?

22 A Yes.

23 Q Can you please go to 466?

24 A Okay.

1 Q What is the date of the two listed on Page
2 466?

3 A 12/31 of '15.

4 Q Does the address 3620 North Clark Street
5 appear on that page?

6 A Yes.

7 Q Can you please go to Page 490 now?

8 A 490?

9 Q 490, correct.

10 A Okay.

11 Q What is the date of the tow listed on Page
12 490?

13 A I can't make out the day of the tow.

14 Q Are you able to make out the month and
15 year?

16 A Yes.

17 Q What is the month and year of the tow?

18 A 1 of '16.

19 Q Is that January of 2016?

20 A Yes, correct.

21 Q Does the address 3620 North Clark Street
22 appear on that page?

23 A Yes.

24 Q How many times does it appear?

1 A Several.

2 Q How many is "several"?

3 A Three.

4 Q Can you now turn to Page 544?

5 A Okay.

6 Q What is the date of the tow listed on Page
7 544?

8 A 1/30 of '16.

9 Q Does the address 3620 North Clark Street
10 appear on that page?

11 A Yes.

12 Q Can you please go to Page 574.

13 A Okay.

14 Q According to Page 574, what is the date of
15 the tow?

16 A I can't make out the year.

17 Q Can you go to Page 576 for me?

18 A Oka

19 Q What is the date of the tow listed on Page
20 576?

21 A 2/13/ of '16.

22 Q And does the address 3620 North Clark
23 Street appear on that page?

24 A Yes.

1 Q Sergeant Sulikowski, can you please go to
2 Page 16 of Exhibit A. I'm sorry. Strike that real
3 quick.

4 Sergeant Sulikowski, based on your review
5 of the Lincoln Tow Log and according to your review of
6 the MCIS Report for the address 3620 North Clark
7 Street, did you reach a conclusion?

8 A The report shows that the address of 3620
9 North Clark street was under contract to another
10 re-locator during the relevant time period.

11 MR. PERL: Can we take a five-minute bathroom
12 break?

13 (BRIEF RECESS)

14 ALJ MONTAGUE: Okay.

15 ALJ MONTAGUE: It is 11:05. Let's go until
16 noon and take a break and come back. Back on the
17 record.

18 BY MR. BARR:

19 Q Sergeant Sulikowski, can you please turn to
20 Page 16 of Exhibit A?

21 A Okay.

22 Q According to the MCIS Report in front of
23 you, what address is that for?

24 A 3700 North Broadway Street in Chicago.

1 Q And according to the MCIS Report, what is
2 the contract status for the relevant time period?

3 A According to the report, there wasn't an
4 account entered and received until 3/18 of '16.

5 Q Sergeant Sulikowski, can you please turn to
6 Page 9 of Exhibit K?

7 A Okay.

8 Q What is the date of the tow listed on Page
9 9?

10 A 7/26/15.

11 Q And do you see the address 3700 North
12 Broadway?

13 A Yes.

14 Q Can you please go to Page 496?

15 A Okay.

16 Q When is the date of the tow on Page 496?

17 A 1/10/16.

18 Q And does the address, 3700 North Broadway
19 appear on that page?

20 A Yes.

21 Q And how many times does it appear on that
22 page?

23 A Twice.

24 Q Can you please go to Page 631 for me.

1 ALJ MONTAGUE: What is the page number?

2 MR. BARR: 631.

3 THE WITNESS: Okay.

4 BY MR. BARR:

5 Q What is the date of the tow listed on Page
6 631?

7 A 3/9 of '16.

8 Q Does the address 3700 North Broadway appear
9 on that page?

10 A Yes.

11 Q Based on the review of the Lincoln Tow Log
12 in front of you and the MCIS Report in front of you
13 for the address 3700 North Broadway, did you reach a
14 conclusion?

15 A The report on the tow sheet show that there
16 wasn't any contract entered and received against that
17 property until 3/18 of '16.

18 Q And according to the MCIS Report, when was
19 the date that contract was entered?

20 A 3/18 of '16.

21 Q And Sergeant Sulikowski, can you please go
22 to Page 18 of Exhibit A?

23 A Okay.

24 Q What address is on Page 18 of Exhibit A

1 for?

2 A 3923 North Clarendon Avenue in Chicago.

3 Q And according to the MCIS Report, what is
4 the contract status for the relevant time period for
5 that?

6 A The report shows that there is no contract on
7 file for the relevant time period.

8 Q Now, can you please go to Page 143 of
9 Exhibit K?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 143?

13 A I can't make the date out.

14 Q Go to Page 463?

15 A Okay.

16 Q What is the date of the two listed on Page
17 463?

18 A 12/31 of '15.

19 Q And does the address 3923 North Clarendon
20 Avenue appear on that page?

21 A Yes.

22 Q And based on your review of the Lincoln Tow
23 Log and according to the MCIS Report in front of you
24 for the address 3923 North Clarendon Avenue, did you

1 reach a conclusion?

2 A The report shows that there was no contract
3 entered or received on that -- during the relevant time
4 period.

5 Q Sergeant Sulikowski, can you please go to
6 Page 19 of Exhibit A?

7 A Okay.

8 Q What address is Page 19 of Exhibit A for?

9 A 4102 North Sheridan Avenue in Chicago.

10 Q And according to the MCIS Report, what is
11 the contract status for the relevant time period?

12 A According to the report, there was no contract
13 on file during the relevant time period.

14 Q Now, Sergeant Sulikowski, can you please go
15 to Page 11 of Staff Exhibit K?

16 A Okay.

17 Q What is the date of the two listed on Page
18 11?

19 A 7/26 of '15.

20 Q Does the address 4102 North Sheridan appear
21 on that page?

22 A Yes.

23 Q Can you please go to Page 14?

24 A Okay.

1 Q What is the date of the tow listed on Page
2 14?

3 A 7/29 of '15.

4 Q And the address 4102 North Sheridan Avenue,
5 does it appear on that page?

6 A Yes.

7 Q Can you please turn to Page 140?

8 A Okay.

9 Q What is the date of the tow listed on Page
10 140?

11 A 9/8 of '15.

12 Q And does the address, 4102 North Sheridan
13 Avenue appear on that page?

14 A Yes.

15 Q Can you please turn to Page 172?

16 A Okay.

17 Q What is the date of the tow listed on Page
18 172?

19 A 9/19 of '15.

20 Q Does the address 4102 North Sheridan appear
21 on that page?

22 A Yes.

23 Q Can you please turn to Page 174?

24 A Okay.

1 Q What is the date of tow listed on Page 174?

2 A 9/19 of '15.

3 Q And does the address 4102 North Sheridan
4 appear on that page?

5 A Yes.

6 Q Can you please turn to Page 211?

7 A Okay.

8 Q What is the date of the tow listed on Page
9 211?

10 A 10/1 of '15.

11 Q Does the address 4102 North Sheridan appear
12 on that page?

13 A Yes.

14 Q And can you turn to Page 238?

15 A Okay.

16 Q What is the date of the tow listed on Page
17 238?

18 A 10/10 of '15.

19 Q Does the address 4102 North Sheridan appear
20 on that page?

21 A Yes.

22 Q Can you please go to Page 278?

23 A Okay.

24 Q What is the date of the tow listed on Page

1 278?

2 A 10/23 of '15.

3 Q And does the address 4102 North Sheridan
4 appear on that page?

5 A Yes.

6 Q Can you please turn to Page 296?

7 A Okay.

8 Q What is the date of tow listed on Page 296?

9 A 10/29 '15.

10 Q Does the address 4102 North Sheridan
11 appear?

12 A Yes.

13 Q Can you please turn to Page 315?

14 A Okay.

15 Q What is the date of the tow listed on Page
16 315?

17 A 11/5 '15.

18 Q And does the address 4102 North Sheridan
19 appear on that page?

20 A Yes.

21 Q Can you please turn to Page 358?

22 A Okay.

23 Q What is the date of the tow listed on Page
24 358?

1 A 11/20 of '15.

2 Q Does the address 4102 North Sheridan appear
3 on that page?

4 A Yes.

5 Q Can you please turn to Page 421?

6 A Okay.

7 Q What is the date of the tow listed on Page
8 421?

9 A 12/13 of '15.

10 Q Does the address 4102 North Sheridan appear
11 on that page?

12 A Yes.

13 Q Can you please go to Page 455?

14 A Okay.

15 Q What is the date of the tow listed on Page
16 455?

17 A 12/27 '15.

18 Q Does the address 4102 North Sheridan appear
19 on that page?

20 A Yes.

21 Q Can you please go to Page 650?

22 A Okay.

23 Q What is the date of tow listed on that
24 page?

1 A 3/13 of '16.

2 Q And does the address 4102 North Sheridan
3 appear on that page?

4 A Yes.

5 Q Can you please go to Page 658?

6 A Okay.

7 Q What is the day of tow listed on that page?

8 A 3/18 of '16.

9 Q And does the address 4102 North Sheridan
10 appear on that page?

11 A Yes.

12 Q Now, can you please go to Page 662.

13 A I'm sorry, what page?

14 Q 662.

15 A Okay, I'm there.

16 Q What is the date of the tow listed on that
17 page?

18 A 3/19 of '16.

19 Q And does the address 4102 North Sheridan
20 appear?

21 A Yes.

22 Q And finally could you turn your attention
23 to 668.

24 A Okay.

1 Q What is the date of the tow listed on Page
2 668?

3 A 3/22 of '16.

4 Q Does the address 4102 North Sheridan appear
5 on that page?

6 A Yes.

7 Q Based on review of the Lincoln Tow Logs and
8 the MCIS Report in front of you for the address 4102
9 North Sheridan Avenue, did you reach a conclusion?

10 A The report shows that there was no contract
11 entered or received on that address during the relevant
12 time period.

13 Q Can you please go to Page 21, Staff Exhibit
14 A.

15 A Okay.

16 Q According to the MCIS Report, what address
17 is Page 21 for?

18 A 4801 North Ravenswood Avenue in Chicago.

19 Q Now, if you could please turn your
20 attention to Page 352 of Exhibit K. I'm sorry. Let
21 me back up.

22 According to the MCIS Report, what is the
23 contract status during the relevant time period?

24 A The report shows that there was no contract on

1 file during the relevant time period.

2 Q Sergeant Sulikowski, would you go to Page
3 352?

4 A Okay.

5 Q What is the date of the tow listed on Page?

6 A 11/19 of '15.

7 Q And does the address 4801 North Linden
8 appear on --

9 MR. PERL: For the record, I think it was
10 Ravenwood.

11 MR. BARR: I'm sorry Ravenswood.

12 ALJ MONTAGUE: Why don't you start over.

13 Mr. Barr.

14 BY MR. BARR:

15 Q Sergeant Sulkowski, would you go to Page 10
16 Staff Exhibit K.

17 A Okay.

18 Q According to Staff Exhibit K, what is the
19 date of the tow listed on that page?

20 A 7/26 of '15.

21 Q Does the address 4801 West Ravenswood
22 appear on that page?

23 MR. PERL: Just to make the record clear, I
24 think it is 4801 North Ravenswood.

1 MR. BARR: I'm sorry, 4801 North Ravenswood.

2 ALJ MONTAGUE: Just for clarity, please. Go
3 ahead and reask.

4 BY MR. BARR:

5 Q Sergeant Sulikowski, does 4801 North
6 Ravenswood appear on that page?

7 A It is listed with a different direction.

8 Q Are you familiar with the street
9 Ravenswood?

10 A Yes.

11 Q How are you familiar with the street
12 Ravenswood?

13 A I have passed by it. I have done inspections
14 on that street.

15 Q Are you aware whether the street is a
16 north/south direction street or east/west direction
17 street?

18 A Yes.

19 Q In which direction does it run?

20 A It is a north/south street.

21 Q Can you please turn your attention now to
22 Page 72?

23 A Okay.

24 Q According to Page 72, what is the date of

1 the tow listed on that page?

2 A 8/16 of '15.

3 Q And does the address 4801 North Ravenswood
4 appear on that page?

5 A Yes.

6 Q And according or based on your review of
7 the Lincoln Towing Log and according to the MCIS
8 Report in front of you of 4801 North Ravenswood, did
9 you reach a conclusion?

10 A The report shows that there was no contract
11 entered or received for the relevant time period on
12 that address.

13 Q Sergeant Sulikowski, can you please go to
14 Page 22 of Staff Exhibit A?

15 A Okay.

16 Q What address is Page 22 of Staff Exhibit A
17 for?

18 A 5440 North Clark Street in Chicago.

19 Q And according to the MCIS Report, what is
20 the contract status during the relevant time period?

21 A According to the report, this address was
22 listed to a different relocater during the relevant
23 time period.

24 Q Now, can you please turn to Page 58 of

1 Staff Exhibit K.

2 A Okay.

3 Q What is the date of the tow that is listed
4 on Page 58?

5 A 8/14 of '15.

6 Q Does the address 5440 North Clark Street
7 appear?

8 A Yes.

9 Q Can you please turn to Page 66?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 66?

13 A 8/15 of '15.

14 Q Does the address 5440 North Clark Street
15 appear on that page?

16 A Yes.

17 Q How many times?

18 A Twice.

19 Q Can you please turn to Page 195?

20 A Okay.

21 Q What is the date of the tow that is listed
22 on that page?

23 A It is illegible.

24 Q Can you turn to Page 519?

1 A Okay.

2 Q What is the date of the tow listed on Page
3 519?

4 A I can't make out the day.

5 Q Can you make out the month and year?

6 A Yes.

7 Q And what is the month and year listed on
8 that page?

9 A January of '16.

10 Q And does the address 5440 North Clark
11 Street appear on that page?

12 A Yes.

13 Q Can you turn your attention to Page 601?

14 A Okay.

15 Q What is the date of the tow listed on 601?

16 A 2/23 of '16.

17 Q And does the address 5440 North Clark
18 Street appear on that page?

19 A Yes.

20 Q Based on your review of the Lincoln Tow log
21 and according to the MCIS Report for the address
22 5440 North Clark Street, did you reach a conclusion?

23 A The report shows that a contract was entered
24 and received by a different relocater during the

1 relevant time period.

2 Q Sergeant Sulikowski, can you please turn to
3 the Page 24 of Staff Exhibit A?

4 A Okay.

5 Q According to Staff Exhibit A, Page 24, what
6 address is that for?

7 A 5501 North Kedzie Avenue in Chicago.

8 Q And according to that report, what is the
9 contract status during the relevant time period?

10 A According to the report, the contract was
11 listed to another relocater during the relevant time
12 period.

13 Q Now can you please go to Page 541 of
14 Exhibit K.

15 A Okay.

16 Q According to Page 541, what is the date of
17 the tow on that page?

18 A I can't make out the day. I can make out the
19 month and the year.

20 Q What is the month and year on that page?

21 A January of '16.

22 Q And does the address 5501 North Kedzie
23 appear on that page?

24 A Yes.

1 Q Can you please go to the next page, Page
2 542.

3 A Okay.

4 Q Are you able to make out the date of that
5 tow?

6 A Yes.

7 Q And according to that page, what is the
8 date of tow?

9 A 1/30 of '16.

10 Q And do you see the address listed on that
11 page, 5501 North Kedzie?

12 A Yes.

13 Q Sergeant Sulikowski, based upon your review
14 of the Lincoln Tow log and your review of the MCIS
15 Report in front of you for the address 5501 North
16 Kedzie Avenue, did you reach a conclusion?

17 A The report shows that there was not a contract
18 on file for Lincoln Towing during the relevant time
19 period of these dates of tows.

20 Q Can you please go to Page 25 of Exhibit A?

21 A Okay.

22 Q According to Page 25 of Exhibit A, what
23 address is that MCIS Report?

24 A 5623 North Clark Street in Chicago.

1 Q And what is the status or -- strike that.

2 According to the MCIS Report, what is the
3 contract status for the relevant time period?

4 A The report shows an active contract being held
5 by different relocators during the relevant time
6 period.

7 Q Now I will have you turn to Page 266 of
8 Exhibit K.

9 A Okay.

10 Q What is the date of the tow listed on Page
11 266?

12 A 10/18 of '15.

13 Q And according to Page 266, do you see the
14 address 5623 North Clark Street?

15 A Yes.

16 Q Now can you please turn your attention to
17 Page 365?

18 A Okay.

19 Q What is the date of the tow listed on Page
20 365?

21 A 11/22 of '15.

22 Q Do you see the address 5623 North Clark
23 Street?

24 A Yes.

1 Q Can you now go to Page 377?

2 A Okay.

3 Q What is the date of the tow that is listed
4 on Page 377?

5 A 11/27 of '15.

6 Q And do you see the address 562 North Clark
7 Street?

8 A Yes.

9 Q And can you go to the Page 441?

10 A Okay.

11 Q What is the date of the tow that is listed
12 on that page?

13 A 12/20 of '15.

14 Q And on that page, do you see the address
15 5623 North Clark Street?

16 A Yes.

17 Q Turn to Page 476.

18 A Yes.

19 Q What is the date of the tow listed on Page
20 476?

21 A I can't make out the day.

22 Q Can you make out the month and the year?

23 A Yes.

24 Q And what is the month and year that is

1 listed on that page?

2 A January of '16.

3 Q And on that page do you see the address
4 5623 North Clark Street?

5 A Yes.

6 Q Sergeant Sulikowski, based on your review
7 of the Lincoln Tow logs and the report in front of
8 you for the address 5623 North Clark Street did you
9 reach a conclusion?

10 A The report shows that during the relevant time
11 period there was a contract on file at 5623 North Clark
12 Street in Chicago listed to a different relocater.

13 Q Now, Sergeant Sulikowski, can you please go
14 to Page 26 of Exhibit A?

15 A Okay.

16 Q According to Page 26, what address is that
17 MCIS Report for?

18 A 5713 North Kenmore Avenue in Chicago.

19 Q And what was the contract status of that
20 address during the time period according to that
21 report?

22 A The report shows that during the relevant time
23 period there is a contract listed to a different
24 relocater.

1 Q Turn to Page 55, Staff Exhibit K.

2 A Okay.

3 Q According to Page 55, what is the date of
4 the two listed on that page?

5 A 8/12 of '15.

6 Q And do you see the address 5713 North
7 Kenmore on that page?

8 A Yes.

9 Q Can you please go to Page 99?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 99?

13 A The day has been crossed out and rewritten. I
14 can make out the month and the year.

15 Q What is the month and year on Page 99?

16 A August of '15.

17 Q And do you see the address, 5713 North
18 Kenmore on there?

19 A Yes.

20 Q Can you please go to Page 119?

21 A Okay.

22 Q What is the date of tow listed on Page 119?

23 A 9/1 of '15.

24 Q And do you see the address listed 5713

1 North Kenmore on that page?

2 A Yes.

3 Q Can you please turn to Page 140?

4 A Okay.

5 Q What is the date of the tow that is listed
6 on that page?

7 A 9/8/15.

8 Q And is the address 5713 North Kenmore
9 listed on that page?

10 A Yes.

11 Q Now, Sergeant Sulikowski, based on your
12 review of the Lincoln Tow logs and the MCIS Report
13 in front of you for the address 5713 North Kenmore
14 Avenue, did you reach a conclusion?

15 A The report shows a contract entered and
16 received by a different relocater against that address
17 for the relevant time period.

18 Q Now, Sergeant Sulikowski, can you please
19 turn to Page 27 of Staff Exhibit A?

20 A Okay.

21 Q According to Staff Exhibit A, Page 27, what
22 is the address listed on that report?

23 A 5754 North Western Avenue in Chicago.

24 Q And according to that report, what was the

1 contract status during the relevant time period?

2 A According to the report, a contract was
3 entered and received by a different relocater during
4 the relevant time period.

5 Q Now, Sergeant Sulikowski, can you please go
6 to Page 90 of Staff Exhibit K?

7 A Okay.

8 Q What is the date of the tow listed on Page
9 90?

10 A 8/22 of '15.

11 Q Does the address 5754 North Western appear
12 on that page?

13 A Yes.

14 Q How many times did it appear on that page?

15 A Four.

16 Q Can you please then turn to Page 91?

17 A Okay.

18 Q What is the date of the tow that is listed
19 on Page 91?

20 A 8/22/15.

21 Q And do you see the address 5754 North
22 Western on that page?

23 A Yes.

24 Q And finally, could you turn to Page 455?

1 A Okay.

2 Q What is the date of the tow that is listed
3 on Page 455?

4 A 12/27/15.

5 Q Do you see the address 5754 North Western
6 on there?

7 A Yes.

8 Q And Sergeant Sulikowski, based on your
9 review of the Lincoln Tow log and review of the MCIS
10 report in front of you from the address 5754 North
11 Western Avenue, did you reach a conclusion?

12 A The report shows that contract was entered and
13 received by a different relocater during the relevant
14 time period.

15 MR. BARR: Your Honor, I just have a few -- I
16 am going to go into a big chunk of addresses.

17 MR. PERL: If we could take lunch now that
18 would be great.

19 ALJ MONTAGUE: Off the record.

20 (LUNCH RECESS)

21 ALJ MONTAGUE: Back on the record.

22 BY MR. BARR:

23 Q Sergeant Sulikowski, can you please turn to
24 Page 294 of Exhibit A?

1 A Okay.

2 Q 6105 North Broadway Street in Chicago,
3 according to the MCI Report, what is the contract
4 for that during the relevant time period?

5 A The report shows that the address for the time
6 period was under contract to another relocater.

7 Q Can you now turn to Page 18 of staff
8 Exhibit K?

9 A Okay.

10 Q According to Page 18 of Staff Exhibit K
11 what is the day of tow listed on that page?

12 A I can't make out the day too clearly.

13 Q Can you go to Page 19.

14 A I'm there.

15 Q What is the date of the tow on Page 19?

16 A 7/31 of '15.

17 Q And do you see the address 6105 North
18 Broadway listed on Page 19?

19 A Yes.

20 Q Can you please now go to Page 23?

21 A Okay.

22 Q What is the date of the tow listed on Page
23 23?

24 A 8/1 of '15.

1 Q And does the address, 6105 North Broadway
2 appear on Page 23?

3 A Yes.

4 Q How many times does it appear on Page 23?

5 A Five.

6 Q I'm sorry. What was that?

7 A Five.

8 Q Can you now go to Page 89?

9 A Okay.

10 Q What is the date of the tow listed on Page
11 89?

12 A 8/22/15.

13 Q And does the address 6105 North Broadway
14 appear on that page?

15 A There is an extra number placed in that
16 address.

17 Q What do you mean "an extra number placed?"

18 A It reads 61015 North Broadway.

19 Q What about if you turn to Page 96?

20 A Okay.

21 Q What is the date of the tow on Page 96?

22 A 8/23 of '15.

23 Q And do you see the address 6105 North
24 Broadway on that page?

1 A Yes.

2 Q I want you to turn back to Page 95. What
3 is the date of the two listed on Page 95?

4 A 8/23/15.

5 Q And does the address 6105 North Broadway
6 appear?

7 A Yes.

8 Q Can you please turn your attention to Page
9 105?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 105?

13 A 8/27 of '15.

14 Q Does the address 6105 North Broadway
15 appear?

16 A Yes.

17 Q Move on to Page 127.

18 A Okay.

19 Q What is the day of the two listed on Page
20 127?

21 A 9/4 of '15.

22 Q And does the address 6105 North Broadway
23 appear on Page 127?

24 A Yes.

1 Q And then the next — can you go to Page
2 130?
3 A Okay.
4 Q What is the date of the tow listed on Page
5 130?
6 A It is unclear.
7 Q Can you go to Page 146.
8 A Okay.
9 Q Are you able to read the date on Page 146?
10 A Yes.
11 Q What is the date of the tow on Page 146?
12 A 9/10 of '15.
13 Q And is the address 6105 North Broadway
14 listed on that page?
15 A Yes.
16 Q Can you please turn to Page 170?
17 A Okay.
18 Q What is the date of the two listed on Page
19 170?
20 A The month is unclear to me.
21 Q What if you turned to Page 174?
22 A Okay.
23 Q What is the date of the tow listed on Page
24 174?

1 A 9/19 of '15.

2 Q And do you see the address 6105 North
3 Broadway on there?

4 A I do, yes.

5 Q Can you turn to Page 190 for me, please?

6 A Okay.

7 Q What is the date of the tow listed on Page
8 190?

9 A 9/25 of '15.

10 Q And is the address 6105 North Broadway,
11 does it appear on that page?

12 A Yes.

13 Q Turn to Page 197.

14 A Okay.

15 Q What is the date of the tow listed on 197?

16 A 9/26 of '15.

17 Q Does the address 6105 North Broadway appear
18 on that page?

19 A Yes.

20 Q And the next -- if you will turn to Page
21 238?

22 A Okay.

23 Q What is the date of the tow listed on Page
24 238?

1 A 10 of '15.

2 Q Does the address on Page 238, 6105 North
3 Broadway, does it appear there?

4 A Yes.

5 Q Does it appear more than once?

6 A Yes.

7 Q How many times does it appear?

8 A Three.

9 Q Can you next turn to Page 296?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 296?

13 A 10/29 '15.

14 Q Is the 6105 North broad way appear on that
15 page.

16 A Yes.

17 Q And can you turn a few pages to Page 299?

18 A Okay.

19 Q What is the date of the tow listed on Page
20 299?

21 A 10/31 of '15.

22 Q Does the address 6105 North Broadway appear
23 on 299?

24 A Yes.

1 Q Next turn to Page 317.

2 A Okay.

3 Q What is the date of the tow listed on Page
4 317?

5 A 11/06 of '15.

6 Q Does the address 6105 North Broadway appear
7 on that page?

8 A Yes.

9 Q Can you next turn to Page 326?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 326?

13 A 11/08 of '15.

14 Q And does the address 6105 North Broadway
15 appear on that page?

16 A Yes.

17 Q And can you next go to Page 358?

18 A Okay.

19 Q And what is the date of the tow listed on
20 Page 358?

21 A 11/20/15.

22 Q Does the address 6105 North Broadway appear
23 on that page?

24 A Yes.

1 Q And would you mind turning to Page 375?

2 A Okay.

3 Q What is the day of the tow listed on Page
4 375?

5 A 11/26 of '15.

6 Q And does the address 6105 North Broadway
7 appear on that page?

8 A Yes.

9 Q Can you turn ten pages to Page 385?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 385?

13 A 11/29 of '15.

14 Q And does the address 6105 North Broadway
15 appear on that page?

16 A Yes.

17 Q And can you turn to Page 401?

18 A Okay.

19 Q What is the date of the tow listed on Page
20 401?

21 A 12/05/15.

22 Q And does the address 6105 North Broadway
23 appear on that page?

24 A Yes.

1 Q And can you turn next to Page 414?

2 A Okay.

3 Q What is the date of the tow on Page 414?

4 A 12/11 of '15.

5 Q And does the address 6105 North Broadway
6 appear on that page?

7 A Yes.

8 Q Can you please turn to Page 418?

9 A Okay.

10 Q What is the date of the two listed on Page
11 418?

12 A 12/12 of '15.

13 Q Does the address 6105 North Broadway appear
14 on that page?

15 A Yes.

16 Q Can you please turn to Page 424?

17 A Okay.

18 Q What is the date of the tow listed on Page
19 424?

20 A 11/12 of '15.

21 Q And does the address 6105 North Broadway,
22 appear on Page 424?

23 A Yes.

24 Q Can you please go to Page 497? What is the

1 date of the two on Page 497?

2 A 1/11/16.

3 Q And does the address 6105 North Broadway
4 appear on that page?

5 A Yes.

6 Q Can you next go to Page 502?

7 A Okay.

8 Q What is the date of the tow listed on Page
9 502?

10 A 1/14 of '16.

11 Q Does the address 6105 North Broadway appear
12 on that page?

13 A Yes.

14 Q Mr. Sulikowski, the MCIS printout in the
15 front of you for the address 6105 North Broadway,
16 did you reach a conclusion?

17 A The record showed that there was a contract
18 entered and received during the relevant time period
19 issued to another relocater.

20 Q Mr. Sulikowski, can you turn to Page 30 of
21 Exhibit A?

22 A Okay.

23 Q According to Page 30 of Exhibit A, what
24 address is that MCIS printout for?

1 A 6550 North Sheridan Road in Chicago.

2 Q According to the printout, 6550 North
3 Sheridan, what was the contract status during the
4 relevant time period?

5 A The report shows that there was no contract on
6 file for this address during the relevant time period.

7 Q Mr. Sulikowski, can you please turn to Page
8 3 of Staff Exhibit K?

9 A Okay.

10 Q What is the date of the tow listed on Page
11 3 of Staff Exhibit A?

12 A 7/24 of '15.

13 Q And the address 6550 Sheridan Avenue
14 appears on that page?

15 A Yes.

16 Q Can you please turn to Page 18?

17 A Okay.

18 Q What is the date of the tow listed on Page
19 18?

20 A 7/31 of '15.

21 Q And the address 6105 North Sheridan Avenue
22 appears on that page? I'm sorry. 6550 North
23 Sheridan Avenue, does that appear on that page?

24 A 6550 North Sheridan appears. There is no

1 Avenue or Road listed. The contract is for Road.

2 Q Based on the review of the Lincoln Tow logs
3 and the MCIS printout in front of your for 6550
4 North Sheridan Road, what was your conclusion?

5 A The report shows that there was no contract on
6 file during the relevant time period.

7 Q Mr. Sulikowski, can you please turn to Page
8 31 of Staff Exhibit A?

9 A Okay.

10 Q According to Page 31 of Staff Exhibit A,
11 what address is that MCIS report for?

12 A 6700 North Greenview in Chicago.

13 Q And what does that MCIS printout tell you
14 about the contract status during the relevant time
15 period?

16 A The report shows that there was no contract on
17 file during the relevant time period.

18 Q Mr. Sulikowski, can you please turn to Page
19 6 of Staff Exhibit K?

20 A Okay.

21 Q What is the date of the tow listed on Page
22 6 of Staff Exhibit K?

23 A 7/25 of '15.

24 Q And on that page, does the address 6700

1 North Greenview appear on that page?

2 A Yes.

3 Q How many times?

4 A Twice.

5 Q And could you next turn to Page 59?

6 A Okay.

7 Q What is the date of the tow listed on Page
8 59?

9 A It is unclear to me.

10 Q Can you please turn to Page 82 then?

11 A Okay.

12 Q What is the date of the tow listed on Page
13 82?

14 A 8/20 of '15.

15 Q On that page does the address 6700 North
16 Greenview appear?

17 A Yes.

18 Q Can you next turn to Page 303?

19 A Okay.

20 Q What is the date of the tow listed on Page
21 303?

22 A 11/31 of '16.

23 Q And does the address of 6700 North
24 Greenview appear on that page?

1 A It appears with a different directional value.
2 Q What directional value does it appear with?
3 A West.
4 Q Are you familiar with the street Greenview
5 in Chicago?
6 A No.
7 Q Now can you go to Page 103
8 A Okay.
9 Q What is the date of the tow listed on Page
10 403?
11 A 12/06 of '15.
12 Q Does the address 6700 North Greenview
13 appear on that page?
14 A Yes.
15 Q Can you please turn to Page 528?
16 A Okay.
17 Q What is the date of the tow on Page 528?
18 A 1/23 of '16.
19 Q And does the address 6700 North Greenview
20 appear on that page?
21 A Yes.
22 Q And can you next turn to Page 670, please?
23 A That is 670.
24 Q Correct.

1 A Okay.

2 Q What is the date of the tow listed on Page
3 670?

4 A 3/23 of '16.

5 Q Does the address 6700 North Greenview
6 appear on that page?

7 A Yes.

8 Q And can you go one more page to Page 671?

9 A Okay.

10 Q What is the date of the tow listed on Page
11 671?

12 A 3/23 of '16.

13 Q Does the address 6700 North Greenview
14 appear on that page?

15 A Yes.

16 Q Based on your review of the MCIS printout
17 in the front of you for the address 6700 North
18 Greenview, did you reach a conclusion?

19 A The report shows that there was no contract on
20 file for the relevant time period.

21 Q Now, Sergeant Sulikowski, can you turn to
22 Page 32 of Staff Exhibit A?

23 A Okay.

24 Q According to that MCIS printout, what is

1 the address listed on Page 32?

2 A The report shows the address is 7000 North
3 Ridge Boulevard in Chicago.

4 Q And Sergeant Sulikowski, can you go to Page
5 438 of Staff Exhibit K?

6 A Okay.

7 Q What is the date of the tow listed on Page
8 428?

9 A 12/15 of '15.

10 Q And does the address 7000 North Ridge
11 Boulevard appear on that page?

12 A Yes.

13 Q And based on your review of the Lincoln Tow
14 log and the printout in front of you for 7000 North
15 Ridge Boulevard, did you reach a conclusion?

16 A The report shows that a contract was not
17 entered from that property until 10/4 '16 and the tow
18 was conducted according to the tow log on 12/15 of '15,
19 and therefore the report shows that there was no
20 contract on file for the date of the tow.

21 Q Thank you.

22 MR. PERL: Judge, objection.

23 MR. BARR: I want to make sure the stated
24 report showed that there was no contract on the --

1 BY MR. BARR:

2 Q Sergeant Sulikowski, are you on Page 32 of
3 the printout?

4 A Yes.

5 Q According to -- when was the contract
6 entered for the property at 7000 North Ridge?

7 A 1/4 '16.

8 ALJ MONTAGUE: Overruled.

9 BY MR. BARR:

10 Q Now, Sergeant Sulikowski, can you turn to
11 Exhibit F?

12 MR. PERL: Can I have a moment?

13 ALJ MONTAGUE: What did you say?

14 MR. PERL: I just need a moment.

15 BY MR. BARR:

16 Q Exhibit K, can you turn to the document
17 that has the number 4394 on it? I think it is
18 towards the back.

19 A They are not Bates stamped, your Honor.

20 ALJ MONTAGUE: Where it says 4394?

21 THE WITNESS: Correct. Okay.

22 BY MR. BARR:

23 Q Sergeant Sulikowski, do you recognize that
24 document?

1 A Yes.

2 Q And how many pages have the 4394 as the
3 RTVO number?

4 A Two.

5 Q And you recognize both of those pages?

6 A Yes.

7 Q What do you recognize those to be?

8 A Screen shots of the MCIS system dealing with
9 the operator's permits.

10 Q And how do you know that is a screen shot
11 from MCIS?

12 A Because that's exactly what the screen looks
13 like. That is not a report.

14 Q Is this a screen you would see if you are
15 using the MCIS system in your car on your computer?

16 A It is.

17 Q Now, you said both of them have RTVO 4394,
18 correct?

19 A Yes.

20 Q What is that number? What is 4394?

21 A 4394 is the number that is assigned to a
22 person when they apply to be an operator.

23 Q And that number, who is it assigned to?

24 A Ronald K. Phillips.

1 MR. PERL: Object as to the foundation.

2 BY MR. BARR:

3 Q Sergeant, does the MCIS printout and the
4 screen shot that you have in front of you, does it
5 say who that number belongs to?

6 A Yes.

7 Q And according to that report, who does that
8 number belong to?

9 A The report shows the name of Ronald K.
10 Phillips.

11 Q And in the first report, when was the
12 application received in the first report?

13 MR. PERL: Couple of objections. Foundation
14 and mischaracterizes the testimony. He said it was a
15 screen shot not a report.

16 ALJ MONTAGUE: Why don't you back up and lay
17 the foundation for your question?

18 BY MR. BARR:

19 Q Mr. Sulikowski, according to the screen
20 shot in the front of you, when was the application
21 received for Operator 4394?

22 A 8/13 of 2013.

23 Q And according to that report that you have
24 in front of you, what was the effective date of that

1 application?

2 A 8/16 of 2013.

3 Q And according to that report that you have
4 in front of you, the screen shot, what was the
5 expiration date for that number?

6 A 8/16 of 2015.

7 Q Now, Sergeant Sulikowski, can you turn to
8 the next screen print that says 4394 on it?

9 A Okay.

10 Q According to that screen shot, what was the
11 Applicant's name? Let me strike that.

12 According to that screen shot, Sergeant,
13 what is the Applicant's name?

14 A Ronald K. Phillips.

15 Q According to that screen shot, when was
16 Mr. Phillips' application received?

17 A 9/17/15.

18 Q And according to that screen shot, what was
19 the effective date of that screen shot?

20 A 2/16 of '16.

21 Q And what was the expiration according to
22 that screen shot?

23 A 2/16/18.

24 Q Look at these screen shots, are you able to

1 draw any conclusions?

2 A According to the screen shot, this operator
3 did not have a valid operator permit from 8/16/15
4 with -- strike that, 8/17 of '15 until 2/16 of '16.

5 Q Now, are Applicants allowed to keep
6 operating during the pendency of their application?

7 MR. PERL: Objection. Foundation. This
8 witness has not testified that he has any knowledge of
9 what the requirements are at all for the Applicants or
10 when they apply or don't apply and whether or not they
11 have pendency to continue towing.

12 ALJ MONTAGUE: I'll let you lay a foundation.

13 BY MR. BARR:

14 Q Sergeant Sulikowski, are you aware of the
15 procedures for an Applicant to apply for a RTVO
16 number?

17 A Yes.

18 Q And are you aware of whether of whether or
19 not the Applicant continued operatoring during the
20 pendency of his application?

21 A It depends on if we are talking about an
22 initial application or a renewal application.

23 Q For a renewal application?

24 A Then it depends upon the expiration of the

1 original application or the original license and when
2 that operator renews, submit it for renewal.

3 Q So for Mr. Phillips, could he continue
4 operating while his application was pending based
5 off the MCIS screen shots that you have in front of
6 you?

7 A According to this, no.

8 Q Now, Sergeant Sulikowski, I want you to
9 turn to Exhibit K, Page 73?

10 A Okay.

11 Q Now, real quick I want to back up a little
12 bit. Why isn't your conclusion based on the MCIS
13 report that Mr. Phillips was not operating while his
14 renewal application was pending?

15 A Because he did not apply according to the
16 screen shot before the original permit expired.

17 Q Now, Sergeant Sulikowski, going back to
18 Exhibit K, are you on Page 73?

19 A Yes.

20 Q What is the date of tow that is on Page 73?

21 A 8/17 of '15.

22 Q Did you see the column "Driver" on that
23 document?

24 A Yes.

1 Q Does the Number 4394 appear throughout that
2 page anywhere?

3 A Yes.

4 Q Can you now turn to Page 74?

5 A Okay.

6 Q What is the date of the tow listed on Page
7 74?

8 A 8/17 of '15.

9 Q And does the number 4394 appear any where
10 on that page?

11 A Yes.

12 Q And is that in the "Driver" column?

13 A Yes.

14 Q Can you turn to the next page, Page 75?

15 A Okay.

16 Q What is the date of tow listed on Page 75?

17 A 8/18 of '15.

18 Q And in the "Driver" column, does the Number
19 4394 appear?

20 A Yes.

21 Q Can you next turn to Page 77?

22 A Okay.

23 Q Can you make out the date of tow on that
24 page?

1 A No.

2 Q Next turn to Page 84, please.

3 A Okay.

4 Q What is the date of tow listed on Page 84?

5 A 8/21 of '15.

6 Q In the "Driver" column does the Number 4394
7 appear?

8 A Yes.

9 Q And can you turn one page to 85?

10 A Okay.

11 Q What is the date of tow listed on Page 85?

12 A 8/21 of '15.

13 Q And does the number in the "Driver" column
14 4394 appear?

15 A Yes.

16 Q How many times?

17 A Twice.

18 Q And can you next go to Page 86?

19 A Okay.

20 Q What is the date of tow listed on Page 86?

21 A 8/21 of '15.

22 Q In the "Driver" column, does the number
23 4394 appear?

24 A Yes.

1 Q How many times?
2 A Twice.
3 Q And can you go to the next page, Page 87,
4 please?
5 A Okay.
6 Q What is the date of tow listed on that
7 page?
8 A 8/22 of '15.
9 Q And in the "Driver" column, does the Number
10 4394 appear?
11 A Yes.
12 Q And can you turn one more page to Page 88?
13 A Okay.
14 Q What is the date of tow listed on Page 88?
15 A 8/22 of '15.
16 Q Does the Number 4394 appear?
17 A Yes.
18 Q Is that in the "Driver" column?
19 A Yes.
20 Q And can you turn to Page 89?
21 A Okay.
22 Q What is the date of tow listed on Page 89?
23 A 8/22 of '15.
24 Q And in the "Driver" column, does the Number

- 1 4394 appear?
- 2 A Yes.
- 3 Q Can you please turn to Page 93?
- 4 A Okay.
- 5 Q What is the date of tow listed on Page 93?
- 6 A 8/23 of '15.
- 7 Q And does the Number 4394 appear in the
- 8 "Driver" column on that page?
- 9 A Yes.
- 10 Q How many times?
- 11 A Twice.
- 12 Q Can you go to Page 94 for me, please?
- 13 A Okay.
- 14 Q What is the date of tow listed on Page 94?
- 15 A 8/23 of '15.
- 16 Q And in the "Driver" column, does the Number
- 17 4394 appear?
- 18 A Yes.
- 19 Q And if you jump ahead of 106 for a moment.
- 20 A Okay.
- 21 Q What is the date of the tow on Page 106?
- 22 A 8/28 of '15.
- 23 Q And in the "Driver" column, does the Number
- 24 4394 appear?

1 A Yes

2 Q How many times?

3 A Five.

4 Q And can you turn to Page 107 for me,

5 please?

6 A Okay.

7 Q What is the date of tow listed on Page 107?

8 A 8/28 of '15.

9 Q Does the Number 4394 appear on that page?

10 A Yes.

11 Q How many times?

12 A Four.

13 Q Can you next turn to Page 108?

14 A Okay.

15 Q What is the date of the tow listed on Page

16 108?

17 A 8/29 of '15.

18 Q And in the "Driver" column does the Number

19 4394 appear on that page?

20 A Yes

21 Q How many times?

22 A Three.

23 Q Can you go to the next page, Page 109?

24 A Okay.

1 Q Are you able to tell what the date of tow
2 is on that page?

3 A No.

4 Q Can you please go to Page 111?

5 A Okay.

6 Q What is the date of tow on Page 111?

7 A 8/29 of '15.

8 Q And in the "Driver" column does the Number
9 4394 appear on that page?

10 A Yes.

11 Q And can you please go to Page 112?

12 A Okay.

13 Q What is the date of tow on Page 112?

14 A 8/30 of '15.

15 Q And the "Driver" column, does the Number
16 4394 appear?

17 A Yes.

18 Q And can you please go to the next page,
19 Page 113?

20 A Okay.

21 Q What is the date of tow listed on Page 113?

22 A 8/30 of '15.

23 Q And does the Number 4394 appear in the
24 "Driver" column on that page?

1 A Yes.

2 Q Can you please turn to the next page, Page
3 114?

4 A Okay.

5 Q What is the date of tow listed on Page 114?

6 A 8/30 of '15.

7 Q In the "Driver" column does the Number 4394
8 appear?

9 A Yes.

10 Q How many times?

11 A Three.

12 Q Can you please go forward to Page 119?

13 A Okay.

14 Q What is the date of tow listed on Page 119?

15 A 9/01 of '15.

16 Q And in the "Driver" column, does the Number
17 4394 appear on that page?

18 A Yes.

19 Q Does it appears more than once?

20 A Yes.

21 Q How many times?

22 A Twice.

23 Q Could you please flip forward to Page 126?

24 A Okay.

- 1 Q When is the date of tow listed on Page 126?
- 2 A 9/04 of '15.
- 3 Q In the driver's column, does the Number
- 4 4394 appear within that page?
- 5 A Yes.
- 6 Q Does it appear more than once?
- 7 A Yes.
- 8 Q How many times?
- 9 A Four.
- 10 Q And can you next go to Page 127?
- 11 A Okay.
- 12 Q What is the date of tow on Page 127?
- 13 A 9/4 '15.
- 14 Q In the "Driver" column does Number 4394
- 15 appear?
- 16 A Yes.
- 17 Q Sergeant Sulikowski, can you please go to
- 18 Page 130?
- 19 A Okay.
- 20 Q What is the date of tow listed on Page 130?
- 21 A I cannot make out for certainty the month.
- 22 Q Can you please turn to Page 140?
- 23 A Okay.
- 24 Q What is the date of two listed on page 140?

1 A 9/8 of '15.

2 Q And does the Number 4349 appear in the
3 "Driver" column?

4 A Yes.

5 Q Does it appear more than once?

6 A Yes.

7 Q How many times does it appear?

8 A Twice.

9 Q Can you please go on to Page 147?

10 A Okay.

11 Q What is the date of tow listed on Page 147?

12 A 9/11 of '15.

13 Q And does the Number of 4394 appear within
14 the "Driver" column on that page?

15 A Yes.

16 Q Can you next turn to Page 149?

17 A Okay.

18 Q What is the date of tow listed on Page 149?

19 A 9/11 of '15.

20 Q Does Number 4394 appear within the "Driver"
21 column on that page?

22 A Yes.

23 Q Does it appear more than once?

24 A Yes.

1 Q How many times?
2 A Twice.
3 Q Can you please go to Page 151?
4 A Okay.
5 Q What is the date of the tow listed on that
6 page?
7 A 9/12 of '15.
8 Q And does the number of 4394 appear within
9 the "Driver" column on that page?
10 A Yes.
11 Q And how many times does it appear?
12 A Twice.
13 Q Can you look at Page 142?
14 A Okay.
15 Q What is the date of tow listed on that
16 page?
17 A 9/12/ of '15.
18 Q And in the "Driver" column on that page
19 does the Number 4394 appear?
20 A Yes.
21 Q Can you please go to Page 153?
22 A Okay.
23 Q What is the date of tow listed on Page 153?
24 A I can't read that date.

- 1 Q Can you turn to Page 154?
- 2 A Okay.
- 3 Q Are you able to tell the day of tow on that
- 4 page?
- 5 A Not the month.
- 6 Q Can you go to Page 156?
- 7 A Okay.
- 8 Q You want to make out the date of tow on
- 9 that page?
- 10 A No.
- 11 Q Sergeant Sulikowski, can you jump to Page
- 12 164?
- 13 A Okay.
- 14 Q What is the date of tow listed on Page 164?
- 15 A 9/16 of '15.
- 16 Q And the "Driver" column, does the Number
- 17 4394 appear on that page?
- 18 A Yes.
- 19 Q Can you please go to Page 168?
- 20 A Okay.
- 21 Q What is the date of tow listed on Page 168?
- 22 A 9/18 of '15.
- 23 Q And then the "Driver" column, does the
- 24 Number 4349 appear?

1 A Yes,

2 Q Does it appear more than once?

3 A Yes.

4 Q How many times?

5 A Three.

6 Q Can you please turn to Page 174?

7 A Okay.

8 Q What is the date of tow listed on Page 174?

9 A 9/19 of '15.

10 Q And the driver column, does the Number 4394

11 appear?

12 A Yes.

13 Q Can you please move to Page 177?

14 A Okay.

15 Q What is the date of tow on Page 177?

16 A 9/20 of '15.

17 Q And the "Driver" column on that page, does

18 the Number 4394 appear?

19 A Yes.

20 Q Does it appear more than once?

21 A Yes.

22 Q How many times does it appear?

23 A Two.

24 Q And moving on to the next page, Page 178.

1 A Okay.

2 Q What is the date of tow on Page 178?

3 A 9/20 of '15.

4 Q In the "Driver" column, the number of 4394

5 appear?

6 A Yes.

7 Q And moving on to Page 182.

8 A Okay.

9 Q What is the date of tow on Page 18?

10 A 9/21 of '15.

11 Q And in the "Driver" column, does the Number

12 4394 appear?

13 A Yes.

14 Q Move on to Page 186.

15 A Okay.

16 Q What is the date of tow listed on Page 186?

17 A 9/24 of '15.

18 Q And in the "Driver" column, does the Number

19 4394 appear?

20 A Yes.

21 Q And moving on to Page 194.

22 A Okay.

23 Q What is the date of the tow listed on Page

24 194?

1 A 9/26 of '15.

2 Q And in the "Driver" column, does the Number
3 4394 appear?

4 A Yes.

5 Q And can you go to Page 195, please?

6 A Okay.

7 Q Are you able to read the date of tow on
8 that page?

9 A No.

10 Q Can you go to Page 196?

11 A Okay.

12 Q What is the date of tow on Page 196?

13 A 9/26 of '15.

14 Q And in the "Driver" column, does the number
15 4394 appear?

16 A Yes.

17 Q Can you please go to Page 197?

18 A Okay.

19 Q What is the day of tow listed on Page 197?

20 A 9/26 of '15.

21 Q In the "Driver" column does the Number 4394
22 appear?

23 A Yes.

24 Q Can you please go to Page 198?

1 A Okay.

2 Q What is the date of tow on Page 198?

3 A 9/26/of '15.

4 Q And on that page, there is a "Driver"

5 column. Does the Number 4394 appear?

6 A Yes.

7 Q Can you please turn to Page 204?

8 A Okay.

9 Q What is the date of tow on Page 204?

10 A 9/28 of '15.

11 Q And in the driver column, does the Number

12 4394 appear on that page?

13 A Yes.

14 Q And can you move to Page 212?

15 A Okay.

16 Q Are you able to read the date on Page 212?

17 A Yes.

18 Q What is the date on that page?

19 A 10/01 of '15.

20 Q And the "Driver" column, does the Number

21 4394 appear?

22 A Yes.

23 Q Can you next turn to Page 214?

24 A Okay.

1 Q What is the date of tow listed on that
2 page?

3 A 10/02 of '15.

4 Q And the "Driver" column on that page, does
5 the Number 4394 appear?

6 A Yes.

7 Q How many times?

8 A Twice.

9 Q Can you please turn to Page 215?

10 A Okay.

11 Q What is the date of the tow listed on Page
12 215?

13 A 10/03 of '15.

14 Q And the "Driver" column on that page, does
15 the Number 4394 appear?

16 A Yes.

17 Q And can you go to Page 217?

18 A Okay.

19 Q What is the date of the tow listed on 217?

20 A 10/03 of '15.

21 Q And the "Driver" column, does the number
22 4394 appear?

23 A Yes.

24 Q How many times does the Number 4394 appear

1 on that page?

2 A Twice.

3 Q Can you turn to Page 218?

4 A Okay.

5 Q What is the date of tow listed on Page 218?

6 A 10/03 of '15.

7 Q And the "Driver" column of Page 218, does
8 the Number 4394 appear?

9 A Yes.

10 Q Can you please go to Page 219?

11 A Okay.

12 Q What is the date of the tow on Page 219?

13 A 10/03 of '15.

14 Q And the "Driver" column, does Number 4394
15 appear?

16 A Yes.

17 Q Can you please go to Page 220?

18 A Okay.

19 Q What is the date of the tow listed on Page
20 220?

21 A 10/03 of '15.

22 Q In the "Driver" column Page 220, does the
23 Number 4394 appear?

24 A Yes.

1 Q Does it appear more than once?
2 A Yes.
3 Q How many times does it appear?
4 A Twice.
5 Q Can you please move on to Page 221?
6 A Okay.
7 Q What is the date of the tow listed on Page
8 221?
9 A 10/04 of '15.
10 Q Does the Number 4394 appear on that page in
11 the "Driver" column?
12 A Yes.
13 Q Can you please flip ahead to Page 226?
14 A Okay.
15 Q What is the date of tow listed on Page 226?
16 A 10/07 of '15.
17 Q And in the "Driver" column on that page,
18 does the Number 4394 appear?
19 A Yes.
20 Q And can you please flip to the next page,
21 227?
22 A Okay.
23 Q What is the date of tow on Page 227?
24 A 10/07 of '15.

1 Q And the "Driver" column on Page 227, does
2 the Number 4394 appear?

3 A Yes.

4 Q Does it appear more than once?

5 A Yes.

6 Q And how many times does that number appear
7 on Page 227?

8 A Twice.

9 Q Could you please move forward on Page 230?

10 A Okay.

11 Q What is the date of tow listed on Page 230?

12 A 10/08 of '15.

13 Q In the "Driver" column, does the Number
14 4394 appear?

15 A Yes.

16 Q Can you please flip to Page 237?

17 A Okay.

18 Q What is the date of the tow listed on Page
19 237?

20 A 10/10 of '15.

21 Q Does the Number 4394 appear in the "Driver"
22 column on Page 237?

23 A Yes.

24 Q Does it appear more than once?

1 A Yes.

2 Q How many times does that number appear on
3 Page 237?

4 A Twice.

5 Q And can you flip ahead two pages to Page
6 239?

7 A Okay.

8 Q What is the date of tow listed on Page 239?

9 A 10/10 of '15.

10 Q And the "Driver" column, does the Number
11 4394 appear?

12 A Yes.

13 Q How many times?

14 A Twice.

15 Q Could you please flip to Page 240?

16 A Okay.

17 Q What is the date of tow listed on Page 240?

18 A 10/10 of '15.

19 Q And in the "Driver" column, does the number
20 4394 appear?

21 A Yes.

22 Q And could you flip to the next page, Page
23 241?

24 A Okay.

1 Q What is the date of tow listed on Page 241?

2 A 10/11 of '15.

3 Q And on Page 241 in the "Driver" column,
4 does the Number 4394 appear?

5 A Yes.

6 Q Can you please flip ahead to Page 245?

7 A Okay.

8 Q What is the date of tow listed on Page 245?

9 A 10/11 of '15.

10 Q And the "Driver" column, does the Number
11 4394 appear?

12 A Yes.

13 Q Can you please flip ahead to Page 248?

14 A Okay.

15 Q What is the date of tow on Page 248?

16 A The year is not clear to me.

17 Q Sergeant Sulikowski, can you flip to Page
18 257?

19 A Okay.

20 Q What is the date of tow listed on Page 257?

21 A 10 16 of '15.

22 Q And in the "Driver" column does the Number
23 4394 appear?

24 A Yes.

1 Q Can you go ahead to the next page, Page
2 258?

3 A Okay.

4 Q What is the date of tow listed on Page 258?

5 A 10/16 of '15.

6 Q In the "Driver" column, does the Number
7 4394 appear?

8 A Yes.

9 Q Does it appear more than once?

10 A Yes.

11 Q How many times does that number appear?

12 A Three.

13 Q Can you go to Page 263?

14 A Okay.

15 Q What is the date of tow listed on Page 263?

16 A 10/17 of '15.

17 Q And the "Driver" column, does the Number
18 4394 appear?

19 A Yes.

20 Q How many times?

21 A Twice.

22 Q Can you please flip a couple of pages to
23 Page 266?

24 A Okay.

1 Q What is the date of tow listed on Page 266?

2 A 10/18 of '15.

3 Q In the "Driver" column does Number 4394

4 appear?

5 A Yes.

6 Q And can you please flip to Page 277?

7 A Okay.

8 Q What is the date of tow listed on Page 277?

9 A 10/23 of '15.

10 Q And the "Driver" column, does the Number

11 4394 appear?

12 A Yes.

13 Q Does it appear more than once?

14 A Yes.

15 Q How many times?

16 A Three.

17 Q And just to back up, go to Page 276.

18 A Okay.

19 Q What is the date of tow listed on Page 276?

20 A 10/21/15.

21 Q In the "Driver" column, does the number

22 4394 appear?

23 A Yes.

24 Q Can you jump two pages to Page 278?

1 Q What is the date of tow listed on Page 278?
2 A 10/23 of '15.
3 Q And the "Driver" column does Number 4394
4 appear?
5 A Yes.
6 Q And how many times?
7 A Twice.
8 Q Can you please go to the next page, Page
9 279?
10 A Okay.
11 Q What is the date of tow listed on Page 279?
12 A 10/23 of '15.
13 Q And the "Driver" column, does the Number
14 4394 appear?
15 A Yes.
16 Q And does it appear more than once?
17 A Yes.
18 Q How many times does the Number 4394 appear
19 on Page 279?
20 A Three.
21 Q Can you go to the next page please, Page
22 280?
23 A Yes.
24 Q And what is the date of tow listed on Page

1 280?

2 A 10/23 of '15.

3 Q And in the "Driver" column, does the Number
4 4394 appear?

5 A Yes.

6 Q Does it appear more than once?

7 A Yes.

8 Q How many times does that number appear on
9 that page?

10 A Three.

11 Q Can you please turn two pages to Page 282?

12 A Okay.

13 Q What is the date of tow listed on Page 282?

14 A 10/24 of '15.

15 Q And the "Driver" column, there is Number
16 4394 appear on that page?

17 A Yes.

18 Q Does it appear more than once?

19 A Yes.

20 Q How many times does that number appear on
21 Page 283?

22 A Three.

23 Q Can you please go to the next page, Page
24 283?

1 A Yes.

2 Q And what is the date of two listed on Page
3 283?

4 A 10/24 of '15.

5 Q And the "Driver" column, does the Number
6 4394 appear?

7 A Yes.

8 Q Does it appear more than once?

9 A Yes.

10 Q And how many times does it appear?

11 A Three.

12 Q Can you please go to the next page, Page
13 284?

14 A Okay.

15 Q What is the date of tow listed on Page 284?

16 A 10/24 of '15.

17 Q And the "Driver" column, does the Number
18 4394 appear?

19 A Yes.

20 Q And on to the next page, Page 285?

21 A Okay.

22 Q Does the number — what is the date of tow
23 on 285?

24 A 10/25 of '15.

1 Q And the "Driver" column, does the number
2 4394 appear?

3 A Yes.

4 Q Can you please go to the next page, Page
5 286?

6 A Okay.

7 Q What is the date of tow listed on Page 286?

8 A 10/25, '15.

9 Q And the "Driver" column, do you see the
10 Number 4394?

11 A Yes.

12 Q Does it appear more than once?

13 A Yes.

14 Q How many times does that number appear on
15 Page 286?

16 A Twice.

17 Q Sergeant Sulikowski, can you please go to
18 Page 292?

19 A Okay.

20 Q What is the date of tow listed on Page 292?

21 A 10/29 of '15.

22 Q And according to -- I'm sorry in the
23 "Driver" column, does the Number 4394 appear on Page
24 292?

1 A Yes.

2 Q How many times?

3 A Twice.

4 Q Can you please turn to Page 310?

5 A Okay.

6 Q What is the date of tow listed on Page 310?

7 A 11/03 of '15.

8 Q And does the Number 4394 appear in the

9 "Driver" column on that page?

10 A Yes.

11 Q Does it appear more than once?

12 A Yes.

13 Q How many times does it appear on that page?

14 A Four.

15 Q Can you please turn to the next page, Page

16 311?

17 A Okay.

18 Q What is the date of tow on Page 311?

19 A 11/03 of '15.

20 Q In the "Driver" column, does the Number

21 4394 appear?

22 A Yes.

23 Q Can you please flip to Page 314?

24 A Okay.

1 Q What is the date of tow on Page 314?
2 A 11/05 of '15.
3 Q In the "Driver" column, does the Number
4 4394 appear?
5 A Yes.
6 Q How many times?
7 A Twice.
8 Q Can you please flip to the next page, Page
9 315?
10 A Okay.
11 Q What is the date of tow on Page 315?
12 A 11/05 of '15.
13 Q And does the Number 4394 appear in the
14 "Driver" column?
15 A Yes.
16 Q And can you flip to Page 327?
17 A Okay.
18 Q What is the date of tow on Page 327?
19 A 11/09 of '15.
20 Q And the "Driver" column, does the Number
21 4394 appear on that page?
22 A Yes.
23 Q Does it appear more than once?
24 A Yes.

1 Q How many times does it appear?

2 A Three.

3 Q And can you please flip to the next page,
4 Page 328?

5 A Okay.

6 Q What is the date of tow on Page 328?

7 A 11/10 of '15.

8 Q And the "Driver" column, does the Number
9 4394 appear?

10 A Yes.

11 Q And can you flip to Page 332?

12 A Okay.

13 Q What is the date of tow on Page 332?

14 A 11/11 of '15.

15 Q And in the "Driver" column, do you see the
16 Number 4394?

17 A Yes.

18 Q Can you please flip to Page 352?

19 A Okay.

20 Q What is the date of tow on 352?

21 A 11/19 of '15.

22 Q And in the "Driver" column, do you see the
23 Number 4394?

24 A Yes.

- 1 Q How many times does it appear?
- 2 A Five.
- 3 Q Can you please go to the next page, Page
4 353?
- 5 A Okay.
- 6 Q What is the date of tow listed on Page 353?
- 7 A 11/19 of '15.
- 8 Q And the "Driver" column, does the Number
9 4394 appear?
- 10 A Yes.
- 11 Q And can you move on to Page 356?
- 12 A Okay.
- 13 Q What is the date of tow listed on Page 356?
- 14 A 11/20 of '15.
- 15 Q And the "Driver" column, does the Number
16 4394 appear?
- 17 A Yes.
- 18 Q Does it appear more than once?
- 19 A Yes.
- 20 Q How many times?
- 21 A Twice.
- 22 Q Can you go to Page 357?
- 23 A Okay.
- 24 Q What is the date of tow listed on Page 357?

1 A 11/20 of '15.

2 Q And the "Driver" column, does the Number
3 4394 appear there?

4 A Yes.

5 Q Can you go to Page 358, please?

6 A Okay.

7 Q What is the date of tow on that page?

8 A 11/20 of '15.

9 Q And the "Driver" column, does the Number
10 4394 appear?

11 A Yes.

12 Q Can you go to Page 359?

13 A Okay.

14 Q What is the date of tow on that page?

15 A 11/21 of '15.

16 Q And the "Driver" column, does the Number
17 4394 appear?

18 A Yes.

19 Q And can you go to Page 360?

20 A Okay.

21 Q What is the date of two on that page?

22 A 11/21 of '15.

23 Q And the "Driver" column, does the Number
24 4394 appear?

1 A Yes.

2 Q Can you go on to Page 363 for me, please?

3 A 363?

4 Q Correct.

5 A Okay.

6 Q What is the date of two on that page?

7 A 11/21 of '15.

8 Q Does Number 4394 appear?

9 A Yes.

10 Q Can you please go on to 364?

11 A Okay.

12 Q What is the date of tow listed on that

13 page?

14 A 11/21 of '15.

15 Q And the "Driver" column, does the Number

16 4394 appear?

17 A Yes.

18 Q And can you go on to the next page, Page

19 365?

20 A Okay.

21 Q What is the date of tow listed on that

22 page?

23 A 11/22 of '15.

24 Q And the "Driver" column, does the Number

1 4394 appear?

2 A Yes.

3 Q And can you please go to Page 366?

4 A Okay.

5 Q What is the date of tow listed on Page 366?

6 A 11/22 of '13.

7 Q In the "Driver" column, does the Number

8 4394 appear?

9 A Yes.

10 Q Can you go on to the next page, Page 367?

11 A Okay.

12 Q What is the date of tow listed on Page 367?

13 A 11/22 of '15.

14 Q In the "Driver" column, does the Number

15 4394 appear?

16 A Yes.

17 Q And can you go on to Page 372?

18 A Okay.

19 Q What is the date of tow on that page?

20 A 11/25 of '15.

21 Q In the "Driver" column, does the Number

22 4394 appear?

23 A Yes.

24 Q Can you please go to Page 373?

1 A Okay.

2 Q What is the date of tow on that page?

3 A 11/25 of '15.

4 Q And the "Driver" column, does the Number

5 4394 appear?

6 A Yes.

7 Q Can you please go on to Page 377?

8 A Okay.

9 Q What is the date of tow listed on that

10 page?

11 A 11/27 of '15.

12 Q And the "Driver" column, does the Number

13 4394 appear?

14 A Yes.

15 Q Can you please go on to Page 380?

16 A Okay.

17 Q What is the date of tow on Page 380?

18 A 11/28 of '15.

19 Q In the "Driver" column, does the Number

20 4394 appear?

21 A Yes.

22 Q Can you go to Page 383 for me, please?

23 A Okay.

24 Q What is the date of tow listed on that

1 page?

2 A 11/29 of '15.

3 Q In the "Driver" column, does the Number
4 4394 appear?

5 A Yes.

6 Q Can you please move on to Page 391?

7 A Okay.

8 Q What is the date of tow listed on that
9 page?

10 A 12/03 of '15.

11 Q Does the Number 4394 appear in the "Driver"
12 column?

13 A Yes.

14 Q Can you please move on to Page 395?

15 A Okay.

16 Q What is the date of tow listed on Page 395?

17 A 12/04 of '15?

18 Q In the "Driver" column, does the Number
19 4394 appear?

20 A Yes.

21 Q Can you please move on to Page 407?

22 A Okay.

23 Q What is the date of tow listed on Page 407?

24 A 12/08 of '15.

1 Q And in the "Driver" column, does the Number
2 4394 appear?

3 A Yes.

4 Q Can you turn to the next page, Page 403?

5 A Yes, okay.

6 Q What is the date of tow on that page?

7 A 12/09 of '15.

8 Q And the "Driver" column, do you see the
9 Number 4394?

10 A Yes.

11 Q Can you move to Page 411, please?

12 A Okay.

13 Q What is the date of the tow listed on Page
14 411?

15 A 12/10 of '15.

16 Q And the "Driver" column, does the Number
17 4394 appear?

18 A Yes.

19 Q Can you please move to Page 413?

20 A Okay.

21 Q What is the date of tow listed on Page 413?

22 A 12/11 of '15.

23 Q And in the "Driver" column, do you see the
24 Number 4394?

1 A Yes.

2 Q Next turn to the Page 415.

3 A Okay.

4 Q What is the date of tow listed on that
5 page?

6 A 12/12 of '15.

7 Q And the "Driver" column, do you see the
8 Number 4394?

9 A Yes.

10 Q Can you please turn to the next page, Page
11 416?

12 A Okay.

13 Q What is the date of tow listed on Page 416?

14 A 12/12 of '15.

15 Q And in the "Driver" column, does the Number
16 4394 appear?

17 A Yes.

18 Q Can you move on to Page 417?

19 A Okay.

20 Q What is the date of tow on Page 417?

21 A 12/12 of '15.

22 Q And the "Driver" column, do you see Number
23 4394?

24 A Yes.

- 1 Q Can you move to Page 419, please?
- 2 A Okay.
- 3 Q What is the date of tow listed on Page 419?
- 4 A 12/12 of '15.
- 5 Q And the "Driver" column, does the number
- 6 4394 appear on that page?
- 7 A Yes.
- 8 Q Can you move to Page 427 for me, please?
- 9 A Okay.
- 10 Q What is the date of tow listed on Page 437?
- 11 A 12/15 of '15.
- 12 Q And the "Driver" column, does the Number
- 13 4394 appear?
- 14 A Yes.
- 15 Q Can you move to Page 431, please?
- 16 A Okay.
- 17 Q What is the date of tow listed on that
- 18 page?
- 19 A 12/16 of '15.
- 20 Q In the "Driver" column, does the Number
- 21 4394 appear?
- 22 A Yes.
- 23 Q Can you move to Page 435 for me, please?
- 24 A Okay.

1 Q What is the date of tow on that page?
2 A 12/19 of '15.
3 Q And the "Driver" column, does the Number
4 4394 appear?
5 A Yes.
6 Q Can you move to Page 439 for me, please?
7 A Okay.
8 Q What is the date of tow listed on that
9 page?
10 A 12/20 of '15.
11 Q And the "Driver" column, does the Number
12 4394 appear?
13 A Yes.
14 Q Can you please move to Page 425?
15 A Okay.
16 Q What is the date of the tow listed on Page
17 425?
18 A 12/22 of '15.
19 Q Does the Number 4394 appear on that page?
20 A Yes.
21 Q How many times?
22 A Four.
23 Q Can you move to Page 448, please?
24 A Okay.

1 Q What is the date of tow listed on Page 448?

2 A 12/25 of '15.

3 Q And in the "Driver" column, does the Number
4 4394 appear?

5 A Yes.

6 Q Can you move to Page 453?

7 A Okay.

8 Q What is the date of tow on that page?

9 A I cannot read it.

10 Q Can you move to Page 456?

11 A Okay.

12 Q What is the date of tow on that page?

13 A 12/27 of '15.

14 Q And the "Driver" column, does the Number
15 4394 appear?

16 A Yes.

17 Q Can you move to Page 462, please?

18 A Okay.

19 Q What is the date of tow on Page 462?

20 A 12/31 of '15.

21 Q And does the Number 4394 appear in the
22 "Driver" column?

23 A Yes.

24 Q Can you move to Page 463, please?

1 A Okay.

2 Q What is the date of tow listed on Page 463?

3 A 12/31 of '15.

4 Q And does the Number 4394 appear there?

5 A Yes.

6 Q And can you go to Page 482?

7 A Okay.

8 Q What is the date of tow that is listed on

9 that page?

10 A 10/6 of '16.

11 Q In the "Driver" column, does the Number

12 4394 appear?

13 A Yes.

14 Q And could you move to Page 489?

15 A Okay.

16 Q What is the date of tow listed on Page 489?

17 A I cannot read it.

18 Q Can you go to Page 507?

19 A Okay.

20 Q What is the date of tow listed on that

21 page?

22 A 1/16 of '16.

23 Q Does the Number 4394 appear within the

24 "Driver" column?

1 A Yes.

2 Q Can you please move on to Page 508?

3 A Okay.

4 Q What is the date of tow listed on that
5 page?

6 A 1/16 of '16.

7 Q And the "Driver" column, does the Number
8 4394 appear?

9 A Yes.

10 Q Can you please move on to Page 514?

11 A Okay.

12 Q What is the date of tow listed on that
13 page?

14 A 1/17 of '16.

15 Q And on that page does the Number 4394
16 appear?

17 A Yes.

18 Q Would you please go to Page 514?

19 A That was 514.

20 Q I'm sorry, 520.

21 A Okay.

22 Q What is the date of tow listed on Page 520?

23 A The top half of the day is cut off.

24 Q You want to read the month and year?

1 A Yes.

2 Q What is the month and year of the tow?

3 A January of 2016.

4 Q In the "Driver" column, does the Number

5 4394 appear?

6 A Yes.

7 Q Can you move to Page 523?

8 A Okay.

9 Q What is the date of the tow listed on that

10 page?

11 A 12/2 of '16.

12 Q In the "Driver" column, does the Number

13 4394 appear?

14 A Yes.

15 Q And move to Page 533.

16 A Okay.

17 Q What is the date of tow listed on Page 533?

18 A I cannot read the day of that date.

19 Q Can you read the month and the year?

20 A Yes.

21 Q What is the month and year listed on that

22 page?

23 A January of 2016.

24 Q And in the "Driver" column, does the Number

1 4394 appear?

2 A Yes.

3 Q Can you move to Page 540?

4 A Okay.

5 Q What is the date of tow listed on Page 543?

6 A I cannot read the day. I can read the month
7 and the year.

8 Q And what is the month and the year on that
9 page?

10 A January of 2016.

11 Q Does the Number 4394 appear on that page?

12 A Yes.

13 Q Can you please go to 544?

14 A Okay.

15 Q What is the date of tow listed on Page 544?

16 A 1/30 of '16.

17 Q And in the "Driver" column on Page 544,
18 does the Number 4394 appear?

19 A Yes.

20 Q Can you please go to Page 554?

21 A Okay.

22 Q What is the date of tow listed on Page 554?

23 A 2/3 of '16.

24 Q In the "Driver" column, does the Number

1 4394 appear?

2 A Yes.

3 Q Can you go to Page 507?

4 A Okay.

5 Q What is the date of tow listed on Page 557?

6 A 2/4 of '16.

7 Q And the "Driver" column, does the Number
8 4394 appear?

9 A Yes.

10 Q And can you please go to Page 576 for me?

11 A Okay.

12 Q What is the date of tow listed on Page 576?

13 A 2/13 of '16.

14 Q Does the Number 4394 appear?

15 A Yes.

16 Q Mr. Sulikowski, how are Consumer Complaints
17 received by the Commerce Commission?

18 A When a car is released to a consumer, a
19 Consumer Complaint is given to them with a copy of the
20 invoice. The Complaint form is on the back of the
21 invoice.

22 Q What is on the front of -- what is included
23 on an invoice?

24 A On the backside is a Consumer Complaint form.

1 On the front side is all physical information that is
2 pertinent to the tow.

3 Q And what type of information is pertinent
4 to a tow?

5 A The relocater's name, the address from which
6 the vehicle was towed, the date and time the vehicle
7 was towed, the Operator's number who drove the vehicle,
8 the Operator and/or Dispatcher, whoever released the
9 vehicle, the amount that was charged to the consumer.
10 There is much more information besides that that is on
11 the front of that form.

12 Q Do you receive consumer complaints?

13 A Yes.

14 Q When you receive a consumer complaint, do
15 you check all the stuff that is on the invoice?

16 A Pertinent information.

17 Q Would that pertinent information include
18 the Operator's number?

19 A Yes.

20 Q And how would you check that operator?
21 What would you do?

22 A We check that through the MCIS System.

23 Q Would you get a screen similar to what you
24 reviewed in Exhibit F?

1 A Correct.

2 Q If you saw the information for Ronald
3 Phillips — strike that.

4 If you receive a consumer complaint
5 between the period of August 7, 2015 to February 16,
6 2016, the date that you testified that Ronald Phillips
7 had no permit, would you issue a citation?

8 MR. PERL: Objection. It mischaracterizes his
9 testimony. He didn't say he had a permit. He said
10 that according to the records. This witness does not
11 have any knowledge as to whether there is a permit. He
12 only testified to the documents and what the screen
13 shots showed.

14 ALJ MONTAGUE: Can you read the question back
15 to me, please?

16 (WHEREUPON the record was read as
17 follows:

18 Q If you receive a consumer
19 complaint between the period of
20 August 7, 2015 to February 16,
21 2016, the date that you testified
22 that Ronald Phillips had no permit,
23 would you issue a citation?")

24 ALJ MONTAGUE: You need to refer to the report

1 rather than what the Officer -- rather than relying on
2 testimony that is not based on the report.

3 BY MR. BARR:

4 Q Based on the report of Exhibit F that you
5 reviewed so far, if a consumer complaint came in for
6 that listed operator, Operator 4394, Ronald
7 Phillips, on the invoice, and you used this
8 information, you would issue citations during the
9 time period?

10 MR. PERL: Calls for speculation. He is
11 asking him to speculate what he would do.

12 ALJ MONTAGUE: That is kind of broad. I mean
13 complained about what?

14 MR. BARR: I'll withdraw the question.

15 Your Honor, originally Exhibit F was a
16 Group Exhibit. I have more operators that I want to
17 get through with Sergeant Sulikowski. These are
18 certified reports including the certification page that
19 Mr. Sulikowki find in the box again signed by Scott
20 Morris, the Transportation Customer Service Supervisor,
21 processing information, certifying that these are
22 Commerce Commission records from the MCIS system.
23 Therefore, I move into the evidence Operator -- the
24 screen print for Operator 4394.

1 ALJ MONTAGUE: Are you going to label that a
2 certain number?

3 MR. BARR: Would K1 be acceptable? I'm sorry,
4 F1.

5 MR. PERL: It is not going to be --

6 MR. BARR: So originally we put in multiple
7 operators. There is two more operators that I would
8 like to go through, but if there is more operators,
9 then I'm not going to go over.

10 ALJ MONTAGUE: You don't want to pull them
11 out?

12 MR. BARR: I could pull them out.

13 ALJ MONTAGUE: We have a couple of minutes.

14 MR. PERL: From Exhibit F some of the
15 documents that we pulled from there and not admitted --

16 MR. BARR: Correct.

17 MR. PERL: And you would not be going over the
18 operator --

19 MR. BARR: There is two more operators. It is
20 going to be quick. Now that we got through Ronald
21 Phillips, his documents are certified records in
22 evidence.

23 MR. PERL: I would renew my objection from the
24 last time. All these documents I believe are

1 improperly admitted into evidence. Scott Morris was
2 never disclosed to us in discovery. Discovery had
3 closed for months when these documents first came to
4 us. I believe again that it is improper to allow these
5 documents. All Scott Morris has is a certification.
6 It doesn't mean the documents are accurate and
7 truthful. That is what the screen shot shows. It
8 doesn't help this Court in any manner at all. Scott
9 Morris isn't here to testify that the information
10 contained is truthful or accurate. If you look at a
11 screen shot that is what it shows that is Number 1.

12 Number 2, these documents came months
13 after discovery was closed. We had no opportunity to
14 cross-examine anybody, including Scott Morris, which we
15 haven't to this date. And this witness has testified
16 under oath, he has no idea who inputs the information
17 here. He cannot possibly lay a foundation for these
18 documents. All he can say to you is, when I look at a
19 screen, it looks like that. He didn't create this one.
20 He didn't do the screen shot. He didn't print this
21 document himself. He doesn't even know if the
22 information here is accurate. He just knows --
23 Sergeant Sulikowski just knows that this looks like
24 what a screen looks like when you look it up.

1 When he testified to you does he
2 recognize the document, there was no foundation for it.
3 How do you recognize it? Did you actually pull this
4 up? Did you print this up? He didn't. Under oath in
5 the deposition he admitted that he didn't create any of
6 these documents. They were created by someone else who
7 he doesn't even know who created them. He has no clue.

8 There is no foundation laid for them at
9 all. Scott Morris' certification is three or four,
10 five months away. We had no opportunity to
11 cross-examine him.

12 I would move that this document should
13 not be moved into evidence. It is highly prejudicial
14 to my client. And if you do admit it, I'm going to ask
15 on Monday when we come back to supplement my discovery,
16 because they were allowed to. I now literally have to
17 go through 300 tows possibly, bring in witnesses that I
18 did not -- that I wasn't aware of. So all during
19 discovery, I had no idea that would be an issue,
20 because none of these are the subject of the citation,
21 not one of them. So everything you heard today, there
22 is not one citation among the whole group. I had no
23 clue about them until we got the documents and even
24 then I didn't know what they were using the documents

1 for because the documents don't speak. They don't
2 speak. They are just documents.

3 Basically, because when I questioned his
4 deposition, Sergeant Sulikowski had no idea. Sergeant
5 Sulikowski at his dep literally testified that he
6 wasn't using any documents to testify. None. That is
7 what he said. I said, "Are you planning to use any
8 documents to testify? No, I'm not."

9 So there is no way I even knew these
10 documents were coming in today, just like the other
11 ones, because I wasn't prepared for any documents to
12 come in because he said he wasn't using documents. If
13 these documents get in, I'm going to ask for a recess
14 of this proceeding. I'm going to need to do further
15 discovery like they did at the last minute and figure
16 out how to best cross-examine and lay a foundation for
17 what I'm going to bring in, because this is the first
18 time I'm hearing of this. It didn't come out in a
19 deposition. The documents came in two weeks before the
20 hearing started or three weeks before the hearing
21 started. I have had no opportunity to do anything.

22 If they come in, I am going to
23 respectfully request that we don't proceed on Monday
24 and that we don't proceed on any of the further dates

1 so I can actually do some proper discovery regarding
2 these documents and how I am going to proceed on
3 defending this. This is just the first time I'm
4 hearing about this.

5 Every single -- to make matters worse,
6 they had our documents for one full year and did
7 nothing with them. I gave these documents to them one
8 year ago. They sat on them and did nothing. So you
9 heard today that they're planning on using somewhere
10 along the lines of let's say 300 tows here. I'm
11 guessing they are not saying it is a good thing for us.
12 I'm guessing it says it reflects poorly on my client.
13 I think -- I don't want to say intentionally, but they
14 certainly waited until a couple of weeks before the
15 hearing to even tell us about it. And I think that is
16 highly improper. It's prejudicial. These documents
17 shouldn't get in. This isn't even about the
18 certification portion, because even if Scott Morris
19 certifies that these documents are the screen shot, he
20 didn't present discovery in this case. He is not even
21 presenting whether these are accurate or not. I've got
22 a multitude of issues here. When my client's license
23 is at issue and for some reason they wait for a year to
24 tell me about this theory. You heard me probably 30

1 times say to them at the hearing, "I don't know why you
2 are proceeding. I don't know what the basis is for
3 proceeding." And you asked them, "What is your basis",
4 and all they would say to you was there is a statute
5 that allows us to proceed. They never once said, oh,
6 by the way Judge, there is these 250 tows that we are
7 going to claim are improper along the way, which they
8 might have said in discovery so I could have done some
9 discovery on it, but they didn't.

10 Including the earlier testimony, which is
11 even more egregious regarding all of these where they
12 say there is no proper contract. At some point in time
13 when we have the FOIAs completed, I will show you a
14 dozen times at least where I have said to them in
15 hearings, "What are we doing here? Why are you
16 proceeding. What did he do wrong?" And you even said
17 to them -- they never once mentioned well, you -- that
18 you didn't have a contract. These came to us three
19 weeks before the hearing. You never once said well,
20 you've used operators that didn't have licenses current
21 at the time. Everything you are hearing in the last
22 three of the testimonies, we've never gotten discovery
23 until, not one piece I had before.

24 So when I deposed Sergeant Sulikowski on

1 these documents, he told me clearly "I'm not using any
2 of them to testify." So I came into this hearing, the
3 last three days and today, not expecting to see any of
4 these documents, because he wasn't using them to
5 testify. And he was the only one who was classified in
6 using it. None of the other witnesses are using these
7 documents.

8 So this is called "trial by ambush". I
9 have said that phrase 100 times to you "trial by
10 ambush". That is how they proceed every single time
11 they go forward. It is "trial by ambush". I'm suppose
12 to guess what they're doing. For a years time they
13 could have told me at any point of time here is what
14 we're doing. I don't understand why this procedure
15 this is any different than anything else I do in Law
16 Division, Chancery, Federal Court where you have to
17 complete discovery accurately and truthfully, the other
18 side gets an opportunity to see what it is and then you
19 do your discovery and then you do depositions.

20 I wasn't given that opportunity. I still
21 wasn't. I think that all testimony should be stricken
22 also for the last two days of Sergeant Sulikowski's
23 testimony. It is highly prejudicial to my client. It
24 has never been disclosed to us before.

1 MR. BARR: Your Honor, these are the same
2 arguments that we heard back for Exhibit A and B for
3 the Scott Morris certified MCIS printout. These are
4 screen shots. They are Commission documents. Counsel
5 has had them before this hearing. He had an
6 opportunity to depose Sergeant Sulikowski. Sergeant
7 Sulikowski has said throughout his deposition that he
8 reviewed the documents that would be discussed today.
9 That would be in reference to the deposition.

10 We don't need to bring Scott Morris in
11 here. These are certified documents. To bring in
12 Scott Morris is the equivalent of bringing in Dorothy
13 Brown every time we had an Applicant who had a criminal
14 conviction.

15 ALJ MONTAGUE: Okay. I'm glad Mr. Barr
16 brought this up. Page 159 of this witness' deposition
17 testimony. "Question, Are you planning on using the
18 documents contained in Exhibit 3 when you testify at
19 the hearing for -- Answer, I personally am not
20 presenting these documents."

21 How am I supposed to know then when he
22 says that, they are going to use the documents? He
23 just said in his dep that he is not going to use the
24 documents.

1 MR. BARR: He said he is not personally
2 presenting the documents.

3 ALJ MONTAGUE: What does that mean?

4 MR. BARR: I think that means he is not
5 bringing in any documents.

6 ALJ MONTAGUE: No one does that.

7 MR. BARR: We take an excerpt from the
8 deposition. That is unfair to pull bits and pieces out
9 of the process.

10 ALJ MONTAGUE: Here is what's going to happen.
11 We are at 3 o'clock.

12 MR. PERL: Is there any information contained
13 strictly just on Exhibit 3 that would lead you to
14 believe that Lincoln Towing is fit or not fit to use a
15 relocator's license?

16 MR. BARR: We established that Sergeant
17 Sulikowski does not have an opinion. It is a legal
18 conclusion. He is not a lawyer. He is a very good
19 Sergeant, a very good police officer, but he is not a
20 lawyer. He cannot make legal conclusions.

21 ALJ MONTAGUE: Everything he said is based on
22 the report. He is not giving personal knowledge. I'm
23 going -- this is my point here. I think I should -- I
24 think you should hold off to move these until you do

1 the others so you could have them all as one exhibit.
2 I'll hold off from that until Monday. So we will
3 proceed as planned on Monday with the last of the
4 testimony. How long do you think that this witness
5 should take on Monday?

6 MR. BARR: Right now I'm planning on an hour
7 or two.

8 ALJ MONTAGUE: We're scheduled to start at 1
9 o'clock. So you might -- well --

10 MR. PERL: Let me make you aware then, Judge,
11 probably on Monday, what I'm going to do is either file
12 a written motion or an oral motion to continue the
13 hearing, if you allow all this into evidence, all these
14 documents in, because I'm going to need time to look
15 through these 600 tows that they are now presenting to
16 this Court. When you count up Exhibit K, along with
17 Exhibit A and Exhibit F with Exhibit A, there are
18 somewhere around 500 or 600 tows I think that you would
19 end up hearing about.

20 MR. BARR: Counsel had these records since
21 April. It is now July.

22 MR. PERL: No, I got these records before the
23 hearing. What I did was, I would go out to take a
24 deposition, only one deposition. I wasn't allowed to

1 do anything else. I took that deposition and the
2 witness told me that he is not using the documents. So
3 why would I do anything else? I didn't. When a
4 witness tells me that, under oath, I take them at their
5 word.

6 I'm going to present the motion to you
7 with the deposition testimony that this witness
8 testified that he was not using them. Then if the
9 documents come in, I'm going to seek a motion to
10 continue the hearing so I could do discovery which I'm
11 allowed to do considering counsel just told you --
12 didn't come to April 24th and discovery, closed in
13 February. The hearing had been already scheduled for
14 the month after I got the document.

15 MR. BARR: The same issue that we hashed out
16 for A and b. Discovery did not close at the end of
17 February. Counsel was allowed to redepose Sergeant
18 Sulikowski after receiving the documents. He had ample
19 time to review those documents and now he just brings
20 it up.

21 MR. PERL: When they say "ample", I don't know
22 what that means. When the case is pending for a year,
23 you don't give it to me. You give it to me and then I
24 have like a week to depose the gentleman and somehow

1 that's ample time when it is literally 670 pages of
2 this, probably 1,000 pages of documents that they are
3 using now that they hadn't disclosed to me that they
4 are saying it's "ample" time for me to do what with.

5 When we had finished the depositions and
6 discovery prior to that, and they knew they had these
7 documents for a year, either they would have to tell
8 you that they held on to them and forgot to use them or
9 they purposely didn't give them to us until a week or
10 two before the initial hearing, because April 24th was
11 three weeks before the initial hearing was scheduled
12 for May.

13 MR. BARR: It was a week or two before we took
14 Mr. Munyon's deposition, which was a discovery
15 deposition which led to the discoverable evidence.

16 MR. PERL: They never once told you what in
17 Mr. Munyon's deposition that led to this. They never
18 talked about any of this. All they said to in his
19 deposition was in general what he put on his tow sheet.

20 ALJ MONTAGUE: I'm going to just join in
21 because I looked through hundreds of tow sheets. I
22 don't understand -- it is self-explanatory. What is it
23 that he said?

24 MR. BARR: Nothing. We needed confirmation of

1 what this stuff is. What the driver number means, that
2 it is the operator that actually towed the vehicles.

3 MR. PERL: Come on.

4 MR. BARR: If you don't take a deposition on
5 someone to confirm this, we have no way to impeach
6 anyone off of their record. We need an explanation of
7 their record.

8 MR. PERL: They want you to believe that they
9 don't know -- they have never seen a 24-hour tow sheet
10 before in their life. This is a document that my
11 client used for 40 years. That they get routinely all
12 the time from my client, from the other gentleman's
13 clients over here. And they want to tell you -- by the
14 way, Judge, if they actually had done, questioning
15 Mr. Munyon about these particular tows, I would agree,
16 but they didn't question him about even one. All they
17 said to him was, what does the operator number mean?
18 He said what is the operator number. What does "tow
19 from mean"? That's the address that it is towed from?
20 What does your make and model mean? That is what they
21 went through. Now they are telling you because they
22 learned what those things mean, now they want to use
23 this. They didn't know that before. And they also
24 want you to believe that from the date of his

1 deposition they somehow went through 1,000 pages and
2 did what they did. There is no way that they did that
3 after his deposition. It is not humanly possible.
4 Just like it is not possible for Sergeant Sulikowski
5 recognizes these documents from seeing them one time on
6 a Friday for four or five hours. It is not even
7 possible. He couldn't have gone through these
8 documents that one day, because he didn't do this.
9 They did it. They just dumped it on him and said you
10 are going to testify to this. So none of it is proper.
11 They keep saying things like they learn new things in
12 Mr. Munyon's deposition. Ask them what one thing they
13 learned about any of this that they didn't know for the
14 one year they had these documents. I'll give you the
15 transcript of it. I'll give you the deposition
16 transcript. And I would defy them to show you one
17 citation to any of these tows where they actually said
18 oh my goodnesses, we didn't know that you had a
19 contract when you towed it. Nothing like that ever
20 happened. By the way in my motion, I'll attach
21 Mr. Munyon's deposition of both transcripts and you'll
22 see Counsel and prior Counsel kept saying it's not in
23 there because it didn't happen. I know that because I
24 was at the deposition and I pretty much have a decent

1 memory of these things and none of it every happened.
2 They made up an excuse later on for you that the reason
3 they didn't do it earlier because they learned new
4 information at Mr. Munyon's deposition, but never told
5 you what that information was, because they didn't.

6 MR. BARR: You want to get into an argument
7 about the exhibits. Staff has never seen any exhibits
8 until they were due. We are not claiming that they are
9 new to this. I don't know. It is kind of he want's it
10 his way.

11 ALJ MONTAGUE: Here is the deal. So we are
12 going back and forth and I said what I'm going to do.
13 You should reserve admitting, moving to admit that one,
14 the last one until you are done with the other,
15 whatever else you are going to do with Mr. Sulikowski.

16 MR. PERL: So we are back on Monday.

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18 (WHEREUPON the hearing was adjourned
19 at 3:08 p.m. to reconvene, Monday,
20 July 10, 2017.)

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STATE OF ILLINOIS)
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COUNTY OF C O O K)

C E R T I F I C A T E

The within and foregoing hearing was taken before GWENDOLYN BEDFORD, Certified Shorthand Reporter in the City of Chicago, County of Cook and State of Illinois, and there were present at the hearing Counsel as previously set forth.

The undersigned is not interested in the within case, nor of kin or counsel to any of the parties.

IN TESTIMONY WHEREOF, I have hereunto set my hand this 1st day of August, 2017.

GWENDOLYN BEDFORD, C.S.R.
No. 084-003700