

8/24/2022 4:42 PM  
By: SW

*Susan W. Morgan*  
CLERK OF THE CIRCUIT COURT  
CHAMPAIGN COUNTY, ILLINOIS

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

**MICHAEL W. WALKER AND** )  
**C.K. GUNSALUS,** )

Plaintiffs, )

and )

**CHRISTOPHER HANSEN,** )

Defendant. )

Case No. 2022CH000039

**COMPLAINT FOR TRESPASS**

Plaintiffs Michael W. Walker and C.K. Gunsalus ("Plaintiffs") allege as follows:

**Background**

1. Plaintiffs are the owners of certain real estate commonly known as 510 West Illinois in Urbana, Illinois ("510 Illinois").
2. Defendant Christopher Hansen (hereinafter "Defendant") is the owner of certain real estate commonly known as 508 West Illinois in Urbana, Illinois ("508 Illinois"). This property is immediately adjacent to 510 Illinois.
3. Despite a final judgment in a prior civil action establishing Plaintiff's right to a six-foot strip of land between 508 Illinois and 510 Illinois, Defendant has repeatedly refused to remove his property from the six-foot strip. Defendant has instead deliberately and maliciously sequentially placed two different vehicles to interfere with Plaintiffs' use and enjoyment of the six-foot strip, causing significant property damage, annoyance, and inconvenience. This action seeks compensatory damages, punitive damages, and injunctive relief for Defendant's deliberate and malicious trespass.

### **Jurisdiction and Venue**

4. Jurisdiction and venue are proper in Champaign County, Illinois, as the properties in question are located in and the events underlying this Complaint occurred in Champaign County, Illinois. 735 ILCS 5/2-101.

### **The Prior Lawsuit**

5. Defendant previously filed a lawsuit in Champaign County, case number 2021-CH-19 (the “Quiet Title Action”), in which he claimed adverse possession of a six-foot strip on the eastern edge of 510 Illinois (the “Six-Foot Strip”). Plaintiffs filed a counterclaim to Defendant’s suit in which they sought to quiet title to the Six-Foot Strip.

6. The basis of Defendant’s claim for adverse possession was his use of a crushed gravel parking spot and a sunken brick patio that, to this day, encroach on the Six-Foot Strip.

7. In his Complaint (a true and correct copy of which is attached as Exhibit A), Defendant defined the boundary of the Six-Foot Strip he was seeking by reference to a survey performed by Berns Clancy and dated May 19, 2020 (the “Survey”), a copy of which is attached as Exhibit B.

8. According to Defendant and the Survey on which he relied, the parking spot extended six feet over the property line onto Plaintiffs’ property, thereby defining the Six-Foot Strip.

9. Plaintiffs won summary judgment in the Quiet Title Action on April 26, 2022, and a true and correct copy of the order is attached hereto as Exhibit C.

10. The order declared that Plaintiffs held “good and clear title to the parcel including 510 Illinois, including the [Six-Foot Strip], superior to any claim by Plaintiff or any other party[.]” Ex. C at 7 (emphasis added).

### **Defendant's Refusal to Vacate the Six-Foot Strip**

11. After the period to appeal the judgment had passed, Plaintiffs' counsel sent an email on May 31, 2022, to Defendant's counsel informing him that Plaintiffs planned to install a barrier on the edge of the Six-Foot Strip delineating their property line, which now was confirmed to include a portion of the crushed gravel parking spot. The email requested that Defendant cease parking vehicles or storing equipment in the parking spot, as he had done in the past.

12. Almost immediately following this email, Defendant parked a tractor in the crushed gravel parking space in such a way as to encroach on the Six-Foot Strip.

13. The tractor in the parking space prevented Plaintiffs from proceeding with the installation of a barrier and other projects on their property as planned.

14. On information and belief, Defendant was aware that his actions would interfere with Plaintiffs' plans, and yet he proceeded with the placement of the tractor deliberately and maliciously.

15. The tractor remained in place, encroaching on Plaintiffs' land, until August 20, 2022.

16. On August 15, 2022, Plaintiffs' counsel sent a letter to Defendant's counsel informing Defendant again that Plaintiffs planned to install a boundary marker on the edge of the Six-Foot Strip, and demanding that Defendant remove the tractor by August 20, 2022.

17. Around 12:02 a.m. on August 20, 2022, Defendant moved the tractor, but minutes later parked a car in the same spot, still encroaching on Plaintiff's land.

18. The car does not have current registration tags, and so Plaintiff's operation of the car was in violation of the law. *See* 625 ILCS 5/3-70; Urbana, Ill. Code of Ordinances §§ 23-1, 23-262 (2013).

19. On the afternoon of August 21, 2022, Plaintiffs installed a “No Parking” sign near the crushed gravel parking spot, and set two railroad ties nearby.

20. On the evening of August 21, 2022, Defendant moved the vehicle further away from the house on his property and further onto Plaintiffs’ property, dislodging one of the railroad ties which Plaintiffs had placed near the boundary in preparation to install it as a barrier.

21. Plaintiffs’ surveillance video camera recorded Defendant’s actions on the evening of August 21, 2022, and the video shows Defendant’s car repeatedly striking the “no-parking” sign, permanently damaging the signpost.

22. Defendant has, at all times relevant to this Complaint, also maintained a sunken brick patio attached to the home 508 Illinois.

23. The sunken brick patio also encroaches onto Plaintiffs’ property by approximately three feet, as shown by the Survey.

24. As of the filing of this Complaint, both the crushed gravel parking spot (including the inoperable vehicle) and the sunken brick patio continue to encroach on Plaintiffs’ property.

#### **Defendant’s Effort to Undermine the Survey**

25. Defendant’s counsel has represented to Plaintiffs’ counsel that Defendant now intends to challenge the accuracy of the Survey, even though he previously relied on that Survey to define the Six-Foot Strip that he was seeking to adversely possess.

26. By presenting the Survey as evidence in support of his complaint and verifying that the statements contained therein were true and correct, Defendant is estopped from now asserting that the Survey is incorrect.

27. In addition, because the court has granted summary judgment to Plaintiffs on their claim to quiet title to the Six-Foot Strip, as defined by the Survey, any challenge to the accuracy of the Survey with respect to the Six-Foot Strip is res judicata and should be dismissed.

### **Damages**

28. Plaintiffs are entitled to actual damages caused by Defendant's trespass, including but not limited to the following expenses: removal of the crushed gravel parking space and repair/resodding of this area; removal of the sunken brick patio and repair/resodding of this area; and damage caused to the "No Parking" signpost.

29. Additionally, Plaintiffs are entitled to punitive damages on account of Defendant's willful, wanton and malicious actions, including intentional damage to Plaintiffs' property and refusal to remove the encroachments on the Six-Foot Strip despite a court judgment quieting title to the Six-Foot Strip in the Plaintiffs. *See Rodrian v. Seiber*, 194 Ill. App. 3d 504, 509-10 (5th Dist. 1990).

WHEREFORE, Plaintiffs, Michael W. Walker and C.K. Gunsalus, pray that this Court:

- A. Enter judgment in their favor and against Defendant Christopher Hansen for actual and punitive damages in an amount to be proven at trial resulting from Defendant's willful, wanton and malicious actions in encroaching on Plaintiffs' property;
- B. Award Plaintiffs attorney's fees and costs (*See Gearhart v. Gearhart*, 2020 IL App (1st) 190042, ¶ 156);
- C. Enjoin Defendant from continuing to trespass on their property; and
- D. Grant all other relief the Court deems appropriate.

Respectfully submitted,  
MICHAEL W. WALKER and  
C.K. GUNSALUS,  
Defendants,

By WEBBER & THIES, P.C.

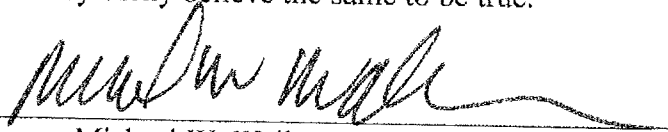
By: /s/ David C. Thies  
David C. Thies

PREPARED BY:

David C. Thies (ARDC 3126449)  
Daniel R. Thies (ARDC 6304141)  
Joseph A. Souligne (ARDC 6330480)  
WEBBER & THIES, P.C.  
202 Lincoln Square  
P.O. Box 189  
Urbana, IL 61801  
Telephone: (217) 367-1126  
Facsimile: (217) 367-3752  
Email: dthies@webberthies.com  
danielthies@webberthies.com  
jsouligne@webberthies.com

**VERIFICATION**

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

A handwritten signature in black ink, appearing to read "Michael W. Walker", written over a horizontal line.

Michael W. Walker, Plaintiff

Date: August 24, 2022

# **Exhibit A**



4/9/2021 2:46 PM  
By: GF

*Susan W. McGraw*  
CLERK OF THE CIRCUIT COURT  
CHAMPAIGN COUNTY, ILLINOIS

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
CHAMPAIGN COUNTY, ILLINOIS

CHRISTOPHER HANSEN, )  
 )  
Plaintiff, )  
 )  
and )  
 )  
MICHAEL WALKER, TINA )  
GONZALES, and all other UNKNOWN )  
HEIRS, UNKNOWN LEGATEES OF )  
DECEASED OWNERS, UNKNOWN )  
OWNERS, and NON-RECORD )  
CLAIMANTS, )  
 )  
Defendants. )

2021CH000019

COMPLAINT

ACTION TO QUIET TITLE

Now comes the Plaintiff, CHRIS HANSEN, by and through his attorney, Scott Anderson, Jr., of the law firm of Dodson, Piraino & Associates and as his Action to Quiet Title against MICHAEL WALKER, TINA GONZALES, and all other UNKNOWN HEIRS, UNKNOWN LEGATEES OF DECEASED OWNERS, UNKNOWN OWNERS, and NON-RECORD CLAIMANTS states as follows:

1. By virtue of a deed recorded September 14, 2006 as document number 2006R25850 the Plaintiff is the owner of the following described real estate:

The west forty-four feet eleven inches of the east sixty-four feet eleven inches of Lot 2 in J. F. Snyder's addition to Urbana, per plat recorded May 21, 1858 in deed record "O" at page 195, in Champaign County, Illinois, also known as 508 West Illinois Street, Urbana, Illinois with permanent index number: 92-21-17-129-010. See Deed attached hereto as Exhibit A.

2. By virtue of a deed recorded July 25, 2019 as document number 2019R11854 the Defendants MICHAEL WALKER and TINA GONZALES claim to be the owners of the following described real estate:

Part of Lot 2 of J. F. Snyder's addition to Urbana, as per plat recorded in deed record "O" at page 195, described as follows: Commencing at a point seventy feet east of the southwest corner of Lot 2, thence east forty-five feet, thence north sixty-three feet to the alley, thence west forty-five feet, thence south sixty-three feet to

the place of beginning, situated in the County of Champaign in the State of Illinois, also known as 510 West Illinois Street, Urbana, Illinois with permanent index number 92-21-17-129-009. See Deed attached hereto as Exhibit B.

3. The Plaintiff brings this action to establish that pursuant to 735 ILCS 5/13-101 he is the legal owner of the east six feet of the east forty-five feet of 510 West Illinois Street, Urbana, Illinois ("the parcel of land") by virtue of adverse possession of said parcel of land by he and his predecessors in interest for more than twenty years in derogation of the claims of **MICHAEL WALKER** and **TINA GONZALES** and all other **UNKNOWN HEIRS, UNKNOWN LEGATEES OF DECEASED OWNERS, UNKNOWN OWNERS, and NON-RECORD CLAIMANTS**, Defendants. See Survey attached hereto as Exhibit C.
4. There may be **UNKNOWN HEIRS, UNKNOWN LEGATEES OF DECEASED OWNERS, UNKNOWN OWNERS, and NON-RECORD CLAIMANTS** claiming interests in said land and they are joined as defendants to extinguish their claims.

#### ADVERSE POSSESSION CLAIM

5. On or about September 14, 2006, Plaintiff occupied and assumed financial responsibility for and possession of the parcel of land.
6. For in excess of twenty years, Plaintiff's possession of the parcel of land and the possession of the parcel of land by the Plaintiff's predecessors in interest, has been:
  - a) continuous;
  - b) hostile and adverse;
  - c) actual;
  - d) open, notorious and exclusive; and
  - e) under claim of title inconsistent with that of the true owner.
7. Continuous Possession: Through the present, Plaintiff, and his predecessors in interest, maintained and possessed the parcel of land as his/their sole and permanent property to the exclusion of all others.
8. Hostile and Adverse Possession: Through the present, Plaintiff, and his predecessors in interest, assumed financial responsibility and exercised acts of property ownership incompatible with that of the owner of record through his/their use, control, occupation and residency on the parcel of land.
9. Through the present, Plaintiff and his predecessors in interest continuously and consistently engaged in the following hostile and adverse ownership acts of possession of the parcel of land:
  - a.) Personally engaged in lawn maintenance, landscaping and shrubbery care and removal;

- b.) Maintained and preserved the parcel of land's boundaries;
  - c.) Paid for repairs, maintenance, and improvements to the parcel of land including the construction of the sunken brick patio, driveway, stairs, and other improvements;
  - d.) Kept the parcel of land free and clear of any liens and/or encumbrances;
  - e.) Personally engaged in lawn maintenance and décor;
  - f.) Paid all utilities;
  - g.) Utilized the stairway to access the residences on the upper levels of 508 W. Illinois street to the exclusion of all non-invitees;
  - h.) Utilized the driveway to park cars and to access the property to the exclusion non-invitees;
  - i.) Utilized the sunken brick patio area for social and personal functions to the exclusion of all others and non-invitees;
10. Actual Possession: Through the present, Plaintiff and his predecessors in interest physically and personally maintained control and possession and exercised all responsibility over the parcel of land for in excess of twenty years.
11. Open, Notorious and Exclusive Possession: Upon information and belief, the owner of record was aware of Plaintiff's presence and control of the parcel of land, as well as his predecessors in interest's presence and control of the parcel of land.
12. Through the present, Plaintiff and his predecessors in interest continuously and consistently engaged in the following open, notorious and exclusive acts of possession of the parcel of land:
- a.) Maintained financial responsibility for the property without contributions from the owner of record;
  - b.) Represented himself/themselves as the property's owner to neighbors and the greater community in all informal property related matters.
13. Upon information and belief, no effort has been made nor any claim asserted by any interested party to eject Plaintiff or his predecessors in interest from possession of the parcel of land in over twenty years.
14. Possession Under Claim of Title Inconsistent with that of the True Owner: Plaintiff and his predecessors in interest were the true owners of the parcel of land.
15. Since September 14, 2006 and in the absence of any Order of Court to the contrary, the true owner of the parcel of land remained **CHRIS HANSEN**.
16. For over twenty-three years, Plaintiff and his predecessors in interest have asserted claim of title and acted as the owners-in-fact to the parcel of land without the permission or opposition from any named Defendants, named heirs, unknown heirs, unknown legatees of deceased owners, unknown owners, and non-record claimants.

17. Any legal or equitable right, claim or interest in the parcel of land of the Defendants, unknown heirs, unknown legatees of deceased owners, unknown owners and non-record claimants has expired.
18. After more than twenty years, Defendants no longer have any legal or equitable right, claim or interest in the parcel of land.
19. Plaintiff seeks a declaration that the title to the parcel of land is vested in Plaintiff alone and Defendants have no estate, right, title or interest in the subject property and that said Defendants be forever enjoined from asserting any estate, right, title or interest in the subject property adverse to Plaintiff herein.
20. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff requests that this Court enter an order finding and confirming title in his name in fee simple, free and clear of the purported claims of interest of Defendants, actual title to the parcel of land by Judicial Deed and for such other relief as this Court deems just and equitable.

CHRIS HANSEN, Plaintiff

Dodson, Piraino and Associates, his Attorneys

/s/ Scott Anderson, Jr.

Scott Anderson, Jr., Attorney for Plaintiff

#### VERIFICATION

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

*Christopher Hansen*

CHRISTOPHER HANSEN

Prepared by:  
Scott Anderson, Jr.  
Attorney for Plaintiff  
Dodson, Piraino and Associates  
501 W. University Avenue  
Champaign, IL 61820  
Phone: (217) 359-8200

Fax: (217) 359-9088

Email: [scottdaref@aol.com](mailto:scottdaref@aol.com)

ARDC: #0051497

EXHIBIT A

\* 2 0 0 6 R 2 5 8 5 0 2 \*


2006R25850

RECORDED ON  
09/14/2006 01:36:15PM  
CHAMPAIGN COUNTY  
RECORDER  
BARBARA A. FRASCA  
REC FEE: 25.00  
RHSPS Fee: 10.00  
REV FEE: 210.00  
PAGES 2  
PLAT ACT: 0  
PLAT PAGE:

839732  
**CORPORATE WARRANTY DEED**

THIS INDENTURE WITNESSETH that the GRANTOR, J.T.S. PROPERTIES, L.L.C., an Illinois Limited Liability Company, for and in consideration of Ten Dollars (\$10.00), and other goods and valuable consideration in hand paid, receipt of which is hereby acknowledged, Conveys and Warrants unto CHRISTOPHER G. HANSEN, of the City of Urbana, County of Champaign, and State of Illinois, following described real estate, to-wit:

Champaign County Real Estate Transfer Tax

 \$ 70.00

STATE OF ILLINOIS		REAL ESTATE TRANSFER TAX
STATE TAX	SEP. 14. 06	0014000
	REAL ESTATE TRANSFER TAX DEPARTMENT OF REVENUE	FP 102811

# 0000026165

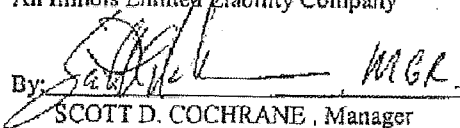
The West 44 feet 11 inches of the East 64 feet 11 inches of Lot 2 in J. F. Snyder's addition to Urbana, per plat recorded May 21, 1858 in Deed Record "O" at Page 195, in Champaign County, Illinois.

More Commonly Known As: 508 West Illinois, Urbana, Illinois  
Permanent Index No: 92-21-17-129-010

- Subject to:
- (1) Real estate taxes for the year 2005 and all subsequent years;
  - (2) Covenants, conditions, restrictions and easements apparent or of record;
  - (3) All applicable zoning laws and ordinances;

IN WITNESS WHEREOF, said Grantor has caused its name to be signed to these presents by one of its Managers this 21<sup>st</sup> day of August, 2006.

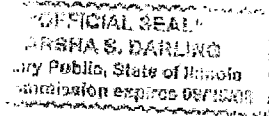
J.T.S. PROPERTIES, L.L.C.  
An Illinois Limited Liability Company

By:   
SCOTT D. COCHRANE, Manager

STATE OF ILLINOIS            )  
  ) SS  
COUNTY OF CHAMPAIGN        )

I, the undersigned, a Notary Public in and for said County and State aforesaid, do hereby certify that SCOTT D. COCHRANE, personally known to me to be the Manager of J.T.S. PROPERTIES, L.L.C., an Illinois Limited Liability Company, and personally known to me to be the person whose name is subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that he signed, sealed and delivered the said instrument as the Manager of said Limited Liability Company, pursuant to the authority given him by the Members in said Operating Agreement of said Company, as his free and voluntary act for the uses and purposes therein set forth.

GIVEN UNDER MY HAND and notarial seal this <sup>22nd</sup> 21<sup>st</sup> day of August 2006.



*Arsha S. Darling*  
\_\_\_\_\_  
Notary Public

**PREPARED BY:**  
Jeffery B. Wampler  
Erwin, Martinkus & Cole, Ltd.  
411 W. University Ave.  
P.O. Box 1098  
Champaign, IL 61824-1098

Send Tax Bill To: *Return to:*  
Christopher G. Hansen  
508 W. Illinois  
Urbana IL 61801

Exempt under the provisions of Paragraph " \_\_\_\_\_ ", Section 4, Real Estate Transfer Tax Act.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_  
Buyer, Seller, or Representative

RETURN TO: Christopher G. Hansen, 508 W. Illinois, Urbana, IL, 61801



EXHIBIT B

ACT 535046



**WARRANTY DEED - JOINT  
TENANCY**

**THE GRANTORS, PAMELA SANTIC, an unmarried person and JOSEPH SANTIC, an unmarried person, being the sole heirs of WILLIAM A. SANTIC, the sole Member and Manager of DOMICILE MANAGEMENT LLC 510 W. ILLINOIS SERIES, a dissolved Illinois Series, LLC, of the City of Urbana, in the County of Champaign, and State of Illinois, for and in consideration of Ten Dollars (\$10.00), and other good and valuable consideration in hand paid, CONVEY and WARRANT to the GRANTEES, MICHAEL W. WALKER and C. K. GUNSALUS, of the City of Urbana, in the County of Champaign, and State of Illinois, not in TENANCY IN COMMON, but in JOINT TENANCY, the following described real estate:**

**2019R11854**  
REC ON: 07/25/2019 09:10:12 AM  
CHAMPAIGN COUNTY  
**MARK SHELDEN**  
REC FEE: 52.00  
RHSPS Fee: 0.00  
STATE TAX: 16.00  
COUNTY TAX: 8.00  
PLAT ACT: 0  
PAGES 2

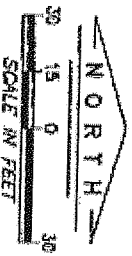
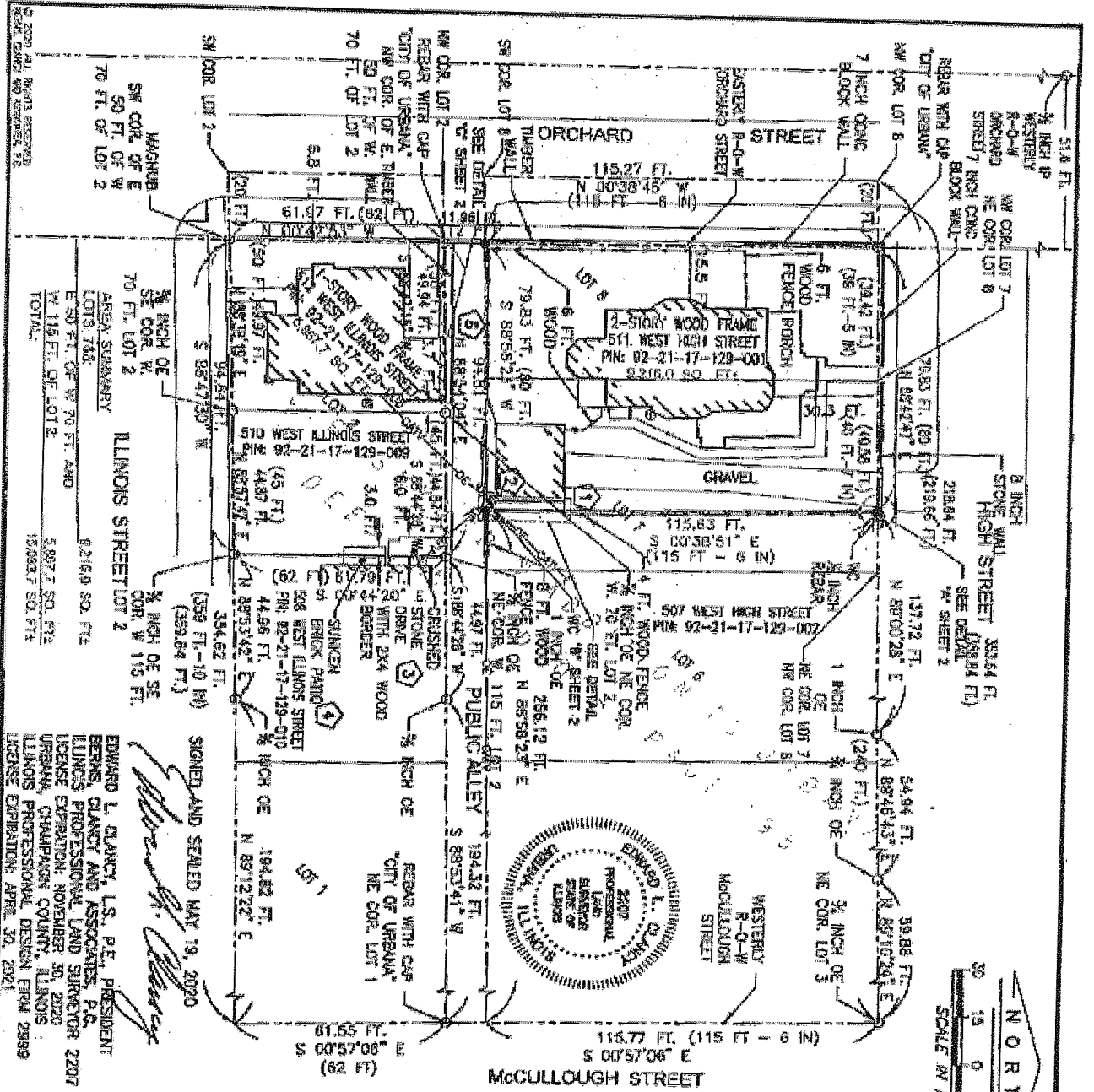
Part of Lot 2 in J.F. Snyder's Addition to Urbana, as per Plat recorded in Deed Record "O" at Page 195, described as follows:  
Commencing at a point 70 feet East of the Southwest corner of lot 2; thence East 45 feet; thence North 63 feet to the alley; thence West 45 feet; thence South 63 feet to the place of beginning.  
Situated in Champaign County, Illinois.

more commonly known as: 510 W. Illinois Street, Urbana, IL;  
(Permanent Index Number: 92-21-17-129-009)

- SUBJECT TO:**
- (1) Real estate taxes for the year 2018 and subsequent years;
  - (2) Covenants, conditions, restrictions and easements apparent or of record;
  - (3) All applicable zoning laws and ordinances;



**EXHIBIT C**



EDWARD L. CLANCY, L.S., P.E., PRESIDENT  
 BERNS, CLANCY AND ASSOCIATES, P.C.  
 ILLINOIS PROFESSIONAL LAND SURVEYOR 2207  
 LICENSE EXPIRATION: NOVEMBER 30, 2023  
 URBANA, CHAMPAIGN COUNTY, ILLINOIS  
 ILLINOIS PROFESSIONAL DESIGN FIRM 2999  
 LICENSE EXPIRATION: APRIL 30, 2021

SIGNED AND SEALED MAY 19, 2020

*Edward L. Clancy*

- LEGEND**
- 30 INCH LONG, 1/2 INCH DIAMETER IRON PIPE SURVEY MONUMENT SET WITH ALUMINUM CAP STAMPED "L.S. YEAR 2007"
  - EXISTING IRON PIPE/PIN SURVEY MONUMENT FOUND
  - ✕ EXISTING CHISELED "X" SURVEY MONUMENT FOUND IN CONCRETE
  - ⊙ CONCRETE WALL SURVEY MONUMENT FOUND
  - EXISTING FENCE LINE
  - - - EXISTING RIGHT-OF-WAY LINE
  - TITLE LINE
  - ===== EXISTING BUILDING LINE
  - EXISTING UTILITY POLE/POWER GUY
  - EXISTING ELECTRIC LIGHTING WAREHOUSE (PAND HOLE)
  - EXISTING OVERHEAD ELECTRIC LINE
  - - - EXISTING OVERHEAD CABLE TELEVISION LINE
  - ⊙ EXISTING ELECTRIC PEDESTAL
  - ⊙ EXISTING SANITARY SEWER CLEANOUT
  - ⊙ EXISTING AIR CONDENSER
  - DESTINATION OUTSIDE OF AREA
  - WIDTH CORNER
  - PM PERMANENT INDEX NUMBER
  - 1) RECORD MEASUREMENT AND/OR DATA APPARENT ENCROACHMENT

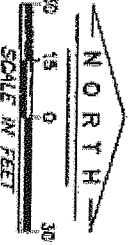
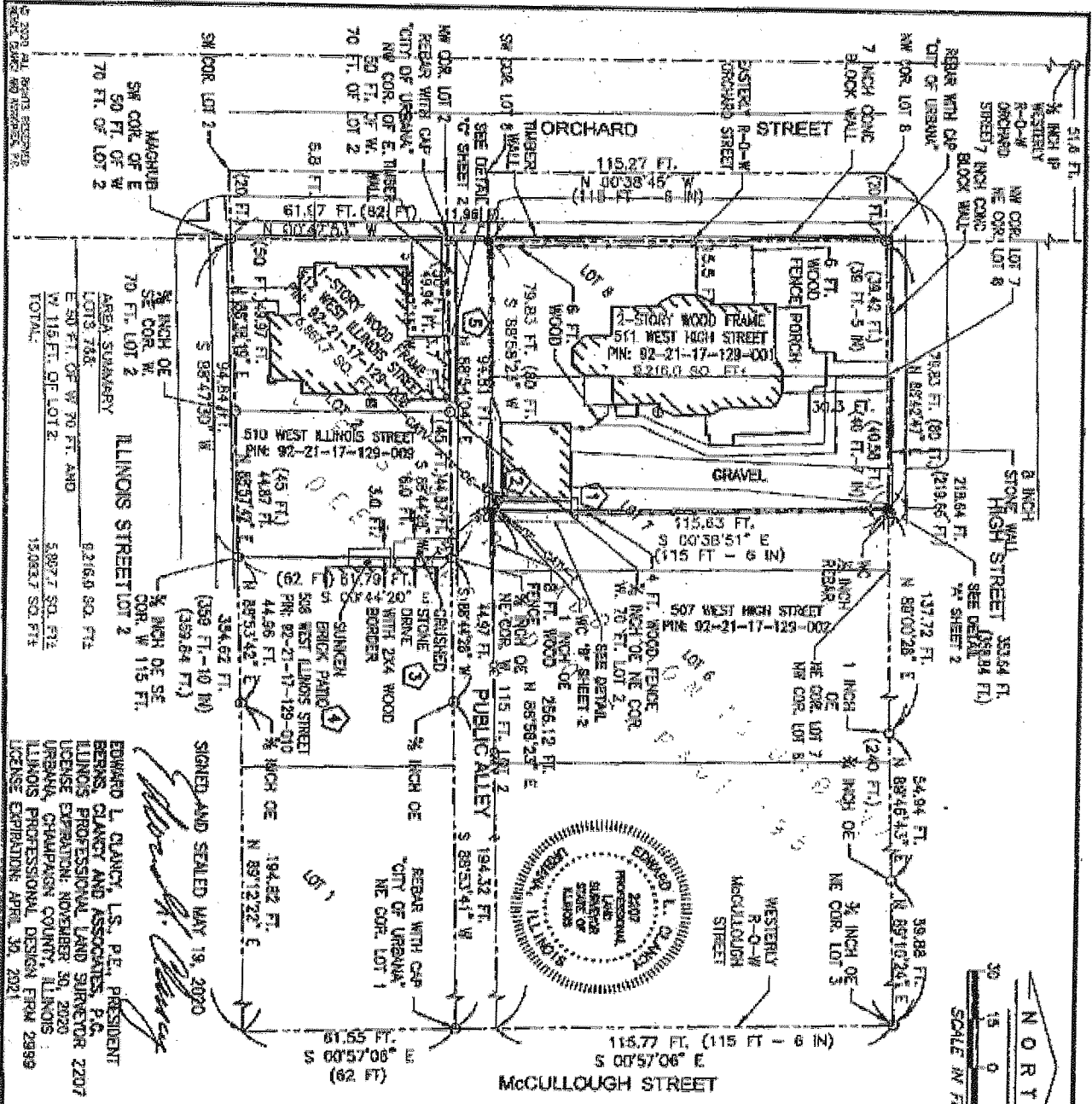
**BOUNDARY SURVEY**  
 OF A PART OF LOT 7 AND 8  
 AND THE WEST PART OF LOT 2  
 OF SNYDER'S ADDITION,  
 CITY OF URBANA,  
 CHAMPAIGN COUNTY, ILLINOIS

**BERNS, CLANCY AND ASSOCIATES**  
 ENGINEERS • SURVEYORS • PLANNERS  
 40 EAST MAIN STREET • POST OFFICE BOX 755  
 URBANA, ILLINOIS 62501-0755  
 PHONE: (217) 244-1144 • FAX: (217) 244-0005

**BCA**

FILE: 7876.2MG	DATE: 05/19/20	SHEET 1 OF 4
JOB#: 7876		

# **Exhibit B**



SIGNED AND SEALED MAY 19, 2020

*Edward L. Clancy*

EDWARD L. CLANCY, L.S., P.E., PRESIDENT  
 BERNS, CLANCY AND ASSOCIATES, P.C.  
 ILLINOIS PROFESSIONAL LAND SURVEYOR 2207  
 LICENSE EXPIRATION: NOVEMBER 30, 2020  
 URBANA, CHAMPAIGN COUNTY, ILLINOIS  
 ILLINOIS PROFESSIONAL DESIGN FROM 2899  
 LICENSE EXPIRATION: APRIL 30, 2021

<p><b>BOUNDARY SURVEY</b>          OF A PART OF LOT 7 AND 8          AND THE WEST PART OF LOT 2          OF SNYDER'S ADDITION,          CITY OF URBANA,          CHAMPAIGN COUNTY, ILLINOIS</p>			
<p><b>BERNS, CLANCY AND ASSOCIATES</b>          ENGINEERS • SURVEYORS • PLANNERS          40 EAST MAIN STREET - FORT GREENE SUITE 100          URBANA, ILLINOIS 62502-2545          PHONE: 618-241-4444 • FAX: 618-241-2444</p>			
FILE:	7878.DWG	DATE:	05/19/20
JOB:	7878	SHEET:	1 OF 4

- LEGEND**
- 30 INCH LONG, 1/2 INCH DIAMETER IRON PIPE SURVEY MARKMENT SET WITH ALUMINUM CAP STAMPED "L.S. 2008 2207"
  - EXISTING IRON PIPE/PIN SURVEY MARKMENT FOUND
  - EXISTING CHISELED "X" SURVEY MARKMENT FOUND IN CONCRETE
  - CONCRETE NAIL SURVEY MARKMENT FOUND
  - EXISTING FENCE LINE
  - EXISTING RIGHT-OF-WAY LINE
  - - - TITLE LINE
  - ||||| EXISTING BUILDING LINE
  - /— EXISTING UTILITY POLE/OWEN GUY
  - /— EXISTING ELECTRIC LIGHTING MANHOLE (HAND HOLES)
  - /— EXISTING OVERHEAD ELECTRIC LINE
  - /— EXISTING OVERHEAD CABLE
  - /— EXISTING TELEVISION LINE
  - /— EXISTING ELECTRIC PEDESTAL
  - ⊙ EXISTING SANITARY SINKER CLEANOUT
  - ⊙ EXISTING AIR CONDENSER
  - DESTINATION OUTSIDE OF AREA
  - WC WINNERS CORNER
  - PM PERMANENT INDEX NUMBER
  - ( ) RECORD MEASUREMENT AND/OR DATA APPARENT ENCROACHMENT