

LAW OFFICES
ZUKOWSKI, ROGERS, FLOOD & MCARDLE
50 VIRGINIA STREET
CRYSTAL LAKE, ILLINOIS 60014
www.zrfmlaw.com

BRADFORD S. STEWART
bstewart@zrfmlaw.com

(815) 459-2050
FAX (815) 459-9057

August 4, 2022

VIA EMAIL TO: rglenberg@aclu-il.org
Rebecca K. Glenberg
Senior Supervising Attorney
Roger Baldwin Foundation of ACLU, Inc.
150 N. Michigan Ave., Ste.600
Chicago, IL 60601

VIA EMAIL TO: kfee@aclu-il.org
Kevin Fee
Attorney
Roger Baldwin Foundation of ACLU, Inc.
150 N. Michigan Ave., Ste.600
Chicago, IL 60601

VIA EMAIL TO: jridings@krvlegal.com
Jeannie Ridings
Attorney
KRV Legal, Inc.
125 S. Virginia Street
Crystal Lake, IL 60014

RE: Future Activities at 2104 Algonquin Road

Dear Attorneys Fee, Glenberg, and Ridings:

The Village of Lake in the Hills appreciates the continued communications to amicably resolve the recent concerns arising out of activities occurring at 2104 Algonquin Road, currently occupied by UpRising Bakery and Café, including the two Zoom discussions we had on August 3.

The parties have reached an amicable understanding as to parameters which UpRising Bakery and Café can follow for any planned activities going forward, to ensure that there are no significant impacts to neighboring properties. These parameters also honor the Zoning Ordinance that does not contemplate 2104 Algonquin Road becoming an “entertainment” venue.

Accordingly, the following parameters are what the parties agreed are reasonable to allow UpRising Bakery and Café to host activities and in the spirit of the zoning requirements:

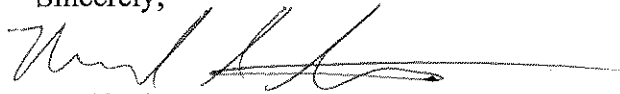
- UpRising Bakery and Café will ensure that its patrons will not deprive other businesses of reasonably sufficient parking spaces for their patrons, utilizing one or more parking attendants, if needed, to coordinate parking. UpRising Bakery and Café will communicate, as necessary, with its landlord and neighboring businesses in the strip center to ensure that its use of the parking lot while hosting activities is not problematic.
- UpRising Bakery and Café will ensure that its activities will be conducted indoors and will not create a noise nuisance or other type of nuisance to neighboring businesses or residents.

- While hosting activities, UpRising Bakery and Café will remain open as a bakery/café, accessible to the public. This does not preclude UpRising Bakery and Café from hosting activities where participants/attendees may occupy a designated area of the premises, inaccessible to others.
- All Village Municipal Code and Zoning Ordinance requirements will be observed, including without limitation, those itemized in the July 8 Letter from Director Joshua Langen, such as occupancy requirements, hours of liquor sales, not having adult entertainment, etc.
- The Village and UpRising Bakery and Café will remain in communication to address any complaints received or concerns that are raised about activities going forward. The Village reserves the right to fully enforce the Municipal Code and Zoning Ordinance going forward and to respond appropriately to any complaints that arise about the impacts of activities on other businesses and residents.

While not a specific parameter pertaining to the Zoning Ordinance, understanding that a hate crime recently occurred at the premises, the Village requests that the owner and all employees are advised to contact the police department should a concern arise and that any threats or actual acts of violence be promptly reported.

The Village would like to thank you again for the collaborative discussions that have identified a mutually satisfactory approach going forward and which honors the Village's zoning and other concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bradford S. Stewart', with a long horizontal flourish extending to the right.

Bradford S. Stewart