IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

JAMES CARROLL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2025MR000306
	)	
ARCHVIEW CONDOMINIUM OWNERS, INC.,	)	
	)	
Defendant.	)	

AFFIDAVIT OF IN SUPPORT OF MOTION TO DISMISS

STATE OF ILLINOIS	)	
	)	SS
COUNTY OF MADISON	)	

I, the undersigned, being duly sworn upon oath, being more than twenty-one years of age, familiar with the business records of Archview Condominium Owners, Inc. ("Archview"), having personal knowledge of the facts set forth in this Affidavit, and, if called as a witness in this matter, could competently testify as follows:

1. I am a member of the Board of Directors of Archview and familiar with its business records.

2. As a board member, I assist in carrying out the administrative duties of the board, which include addressing and identifying issues with common elements and arranging for their repair and maintenance.

3. In August of 2025, a water leak incident occurred from a pipe located in the garage/basement of the building 9 of the Carroll Wood Hill Condominiums commonly known as 1061 Lafayette Ct., Collinsville, Illinois (the "Property").

4. As part of the preliminary investigation, the individual unit owners at the Property were contacted and requested to inspect their unit fixtures/pipes for clogs and/or leaks to determine the source of the water issue.

5. For water leak incidents, the responsibility for the repair varies case-by-case basis and is determined based on the individual facts of each case, including but not limited to the source and/or cause of the leak.

6. Upon Archview's further investigation, it was determined that the cause and/or source of the leak did not originate from James Carroll's unit.

7. As such, Archview is not seeking reimbursement from James Carroll and assumed responsibility for the leak to the pipe.

8. On or about September 18, 2025, Archview caused the pipes in the garage/basement of the Property to be inspected and repaired.

FURTHER AFFIANT SAYETH NOT.

By: Djuna McKenzie

Name: Djuna McKenzie

Title: Member of Board & Secretary

Subscribed and sworn to before me this 28th day of January, 2026.

J RYAN COMBS
OFFICIAL SEAL
Notary Public, State of Illinois
My Commission Expires
April 23, 2026

Notary Public

My Commission Expires: April 23, 2026