

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

COUNTY OF JACKSON, )  
)  
Complainant, )  
)  
v. )  
)  
JACKIE BETANCOURT, )  
)  
Respondent. )

AC 14-39  
Site Code: 077 814 5089



**ORIGINAL**

**RECEIVED**  
CLERK'S OFFICE

**APR 21 2014**

STATE OF ILLINOIS  
Pollution Control Board

**COMPLAINANT'S MOTION TO SUPPLEMENT**

Now comes the Complainant, the County of Jackson, by and through the Jackson County State's Attorney's Office, and moves the Board, in accordance with Section 101.500 of its rules, to supplement the Administrative Citation filed herein. In support of the motion it is stated:

1. Complainant filed its Administrative Citation with this Board on or about February 18, 2014.
2. The Respondent was served with a copy of the Citation on February 24, 2014.
3. The time for which to file a response to the Administrative Citation has expired.
4. Complainant's administrative citation inadvertently misspelled the Respondent's name as "Jackie Bentancourt."
5. The correct spelling of Respondent's name is "Jackie Betancourt."
6. The environmental inspector has provided a supplemental affidavit acknowledging the misspelling on all documents. That affidavit is attached hereto.
7. The misspelling will not cause any harm or prejudice Respondent's defense in this matter, if any she has.

WHEREFORE, the Complainant respectfully requests this Board to grant the motion and allow the record to be changed to reflect the correct spelling of the Respondent's name.

Respectfully submitted,

MICHAEL C. CARR  
Jackson County State's Attorney



DANIEL BRENNER  
Assistant State's Attorney  
Jackson County, Illinois

**PROOF OF SERVICE**

The undersigned certifies that on the 18<sup>th</sup> day of April, 2014, he mailed a true and correct copy of the foregoing to the addressee listed below, by placing a copy of the document in pre-addressed envelopes with proper first class postage affixed, and depositing the sealed envelopes into a US Mail receptacle in Murphysboro, Illinois.

ADDRESSEE:

Jackie Betancourt  
1913 Business Hwy. 13  
Murphysboro, IL 62966



Daniel Brenner  
Assistant State's Attorney

**JACKSON COUNTY HEALTH DEPARTMENT  
AFFIDAVIT**

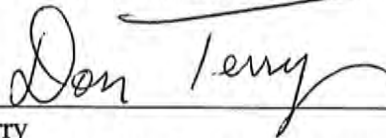
**IN THE MATTER OF:**

**077 814 5089 / Jackson County  
Murphysboro / Jackie Betancourt  
COMPLIANCE FILE**

Jackie Betancourt, Respondent.

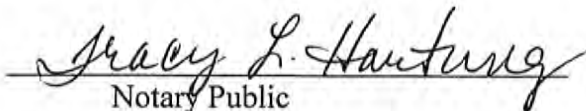
Affiant, Don Terry, being first duly sworn, voluntarily deposes and states as follows:

1. Affiant is an Environmental Compliance inspector employed by Jackson County Health Department and has been so employed at all times pertinent hereto.
2. On January 21, 2014, between the hours of 11:26 a.m. and 11:30 a.m., Affiant conducted an inspection of the open dump site known as Murphysboro/Jackie Betancourt, Jackson County, Illinois.
3. As a result of the activities referred to in Paragraph 2 above, Affiant completed an Inspection Report form. The Inspection Report form and associated documents were filed with the Pollution Control Board on or around March 7, 2014.
4. This Inspection Report and associated documents were filed in pursuit of an Administrative Citation, against the property owner Ms. Jackie Betancourt. The Administrative Citation filing was designated AC 14-39.
5. After the Inspection Report and associated documents were filed with the Pollution Control Board, it was discovered that the last name of the site owner was misspelled on all documents.
6. The correct spelling of the site owner's name is Jackie Betancourt.



Don Terry  
Environmental Compliance Inspector

Subscribed and Sworn To before me  
this 16 day of April, 2014

  
Notary Public





**JACKSON COUNTY STATE'S ATTORNEY**  
**Michael C. Carr, State's Attorney**

Jackson County Courthouse • 1001 Walnut • Third Floor • Murphysboro, IL 62966  
(618) 687-7200 • FAX (618) 687-7215

April 18, 2014

Clerk of the Board  
Illinois Pollution Control Board  
100 W. Randolph, Suite 11-500  
Chicago, Illinois 60601

Re: Administrative Citation/Motion to Supplement  
AC 2014 – 39  
Jackson County v. Jackie Betancourt

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Pollution Control Board

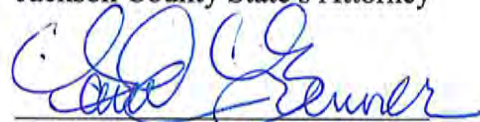
 ORIGINAL

Dear Clerk:

Enclosed for filing with the Board is the Complainant's Motion to Supplement (original plus nine copies). Please acknowledge receipt and filing of the enclosed material. Thank you.

Sincerely,

MICHAEL C. CARR  
Jackson County State's Attorney



DANIEL BRENNER  
Assistant State's Attorney  
Jackson County, Illinois

encls.

cc: Jackson County Health Department