

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

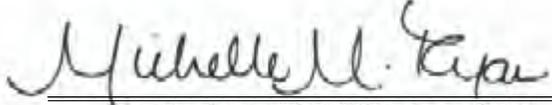
ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Complainant,	)	AC 2023-014
	)	
v.	)	(IEPA No. 70-23-AC)
	)	
ROME and SOKPHEAP KEITH	)	
	)	
	)	
	)	
Respondents.	)	

**NOTICE OF FILING**

To: Rome and Sokpheap Keith  
P.O. Box 66  
Monmouth, IA 52309

PLEASE TAKE NOTICE that on this date I mailed for filing with the Clerk of the Pollution Control Board of the State of Illinois the following instrument(s) entitled MOTION TO DISMISS RESPONDENTS ROME AND SOKPHEAP KEITH.

Respectfully submitted,



e-signature valid for IPCB e-filings ONLY

Michelle M. Ryan  
Assistant Counsel

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

Dated: June 8, 2023

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL	)	
PROTECTION AGENCY,	)	
	)	
Complainant,	)	AC 2023-014
	)	
v.	)	(IEPA No. 70-23-AC)
	)	
ROME and SOKPHEAP KEITH	)	
	)	
	)	
	)	
Respondents.	)	

MOTION TO DISMISS

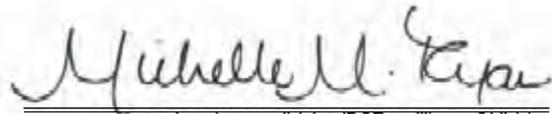
NOW COMES the Complainant, the Illinois Environmental Protection Agency (“Illinois EPA”), by and through its attorney, Assistant Counsel Michelle M. Ryan, pursuant to 35 Ill. Adm. Code 108.402, and respectfully states as follows:

- (1) On May 18, 2023, Illinois EPA issued an Administrative Citation to Respondents Rome and Sokpheap Keith based on an inspection conducted on March 23, 2023.
- (2) Proof of service is not available for Respondents Rome and Sokpheap Keith.
- (3) Because Respondents Rome and Sokpheap Keith were not timely served within 60 days as required by 415 ILCS 5/31.1(b), this Administrative Citation should be dismissed.

WHEREFORE, the Illinois Environmental Protection Agency requests that the Board dismiss the pending action as to Respondents Rome and Sokpheap Keith.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,  
Complainant,

DATED: June 8, 2023



Michelle M. Ryan  
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Assistant Counsel

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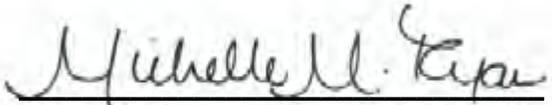
**PROOF OF SERVICE**

I hereby certify that I did on the 8<sup>th</sup> day of June, 2023, send by U.S. Mail with postage thereon fully prepaid, by depositing in a United States Post Office Box a true and correct copy of the following instrument(s) entitled MOTION TO DISMISS.

To: Rome and Sokpheap Keith  
P.O. Box 66  
Monmouth, IA 52309

and an electronic copy of the same foregoing instrument on the same date via electronic filing

To: Don Brown, Clerk  
Pollution Control Board  
60 E. Van Buren St., Ste. 630  
Chicago, IL 60605



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Michelle M. Ryan  
Special Assistant Attorney General

Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
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