

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ANNA ANDRUSHKO	)	
	)	
Complainant,	)	
	)	PCB 23-133
v.	)	
	)	
THOMAS EGAN	)	
	)	
Respondent.	)	

NOTICE OF FILING

TO: Illinois Pollution Control Board  
 Attn: Don Brown – Clerk of the Board  
 100 W. Randolph Street, Suite 11-500  
 Chicago, IL 60601  
[Don.brown@illinois.gov](mailto:Don.brown@illinois.gov)  
[Brad.Halloran@illinois.gov](mailto:Brad.Halloran@illinois.gov)

TO: Anna Andrushko  
 9313 S. Spaulding Avenue  
 Evergreen Park, IL 60805  
[PCB23.133@gmail.com](mailto:PCB23.133@gmail.com)

PLEASE TAKE NOTICE that on May 29, 2025 we filed with the Office of the Clerk of the Pollution Control Board the **Respondent’s Answer To Complainant’s Request For Production** on behalf of the Respondent, Thomas Egan, copies of which are herewith served upon you.

Respectfully Submitted,

WALSH, FEWKES & STERBA

By: 

David A. Fewkes

WALSH, FEWKES & STERBA  
 Attorney for Respondent  
 7270 W. College Drive, Suite 101  
 Palos Heights, IL 60463  
 (708) 448-3401 (ph)  
 (708) 448-8022(fax)  
 Attorney No. 56616  
[Dfewkes@wfstrialaw.com](mailto:Dfewkes@wfstrialaw.com)

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

ANNA ANDRUSHKO )  
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Complainant )  
 ) PCB 23 – 133  
 v. )  
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THOMAS EGAN )  
 )  
Respondent )

**RESPONDENT'S ANSWER TO COMPLAINANT'S REQUEST FOR PRODUCTION**

1. Produce all documents about the acquisition and origin of the dog and that includes all ownership papers and should include: (a) Breed of the dog (b) size of the dog (c) weight (d) acquisition date of dog (e) facility/shelter or where did you acquire the dog (f) medical history (g) and age of the dog.

**ANSWER: Attached are documents in Mr. Egan's possession. Investigation continues.**

2. Identify any and all witnesses you intend to call, mention, and/or introduce at the hearing.
  - a. Experts name(s);
  - b. His/her area of expertise, factual basis for each opinion;
  - c. Address(es);
  - d. Subject matter(s), opinion(s); and
  - e. Amount of compensation paid to each such expert (receipts).

**ANSWER:**

- a. None
- b. N/A
- c. N/A
- d. N/A
- e. N/A

3. Identify any and all documents and reports, and identify with specificity each document, you intend to introduce as an exhibit or to offer into evidence at trial, recordings including, but not limited to, pictures, photographs, visual recorded images, and audio recordings, from your point of view.

The recordings should be the same requirements, referenced in the Respondent's Request to Admit to Complainant, per the measurements of noise emissions adhering to the procedures outlined in Section 900.103 and Section 910.105 of Title 35 of the Illinois

Administrative Code regarding Environmental Protection and Section 901.102(a) and (b) (35Ill. Adm. Code 901.102 (a), (b)). Include numeric measurements of noise emissions prepared by you or a professional, as they relate to this case, including but not limited to descriptions of corresponding measurement techniques and measurement results.

**ANSWER: None other than photographs of backyard which are attached.**

4. Provide respondent's plat of survey, scale, map or drawing of the property located at 9311 S. Spaulding Avenue, Evergreen Park, IL 60805.

**ANSWER: Investigation continues. Objection irrelevant.**

5. Produce compete photos of your back yard and views (north, south, east, west), including fence, lawn, back of house, deck, including garage views and along boundary lot perimeter along adjoining lot where the complainant lot is located. Include photos taken from respondent's deck and at the ground levels. Identify with specificity each document.

**ANSWER: See attached photos.**

6. Provide documentation to support steps you have taken to avoid or reduce the noise nuisance. List any and all equipment or products (toys, raw bones, chew ropes, landscape materials), services provided to (training), including various receipts (not limited to last 60 days, that includes dates, names, names of businesses, contact numbers, and cost.

**ANSWER: See attached photos of backyard.**

7. Produce and identify with specificity all documents considered or used in providing your Answers to the Complainant's Interrogatories delivered simultaneously with this Request to Produce.

**ANSWER: None**

8. Provide veterinarian records of the dog.

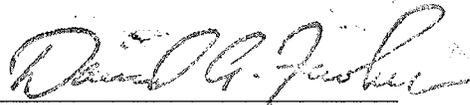
**ANSWER: See attached.**

9. Provide documentation you have received about your dog barking warning behaviors.

**ANSWER: None**

**Investigation continues as to all questions.**

Respectfully Submitted,

By:   
One of its the Attorneys

WALSH FEWKES & STERBA

David A. Fewkes

Attorney for Respondent

7270 W. College Drive, Ste. 101

Palos Heights, IL 60463

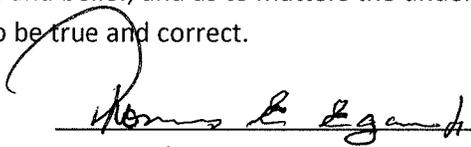
Attorney No. 56616

(708) 448-3401

[Dfewkes@wfstriallaw.com](mailto:Dfewkes@wfstriallaw.com)

**CERTIFICATION**

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 the instrument are true and correct, except as to matters therein stated to be on information and belief, and as to matters the undersigned certifies as aforesaid that he verily believes the same to be true and correct.

  
\_\_\_\_\_  
Thomas Egan

**WITNESS LIST**

- 1. Julie Dahlke**
- 2. Joyce Schramm**

**EXHIBITS**

- A. Photo of 9311 S. Spaulding with white fence blocking dog's view of alley.**
- B. Photo of 9311 S. Spaulding with black tarp blocking dog's view of Ms. Andrushko's yard.**
- C. Photo of 9311 S. Spaulding with black tarp and Ms. Andrushko's cat in the yard.**
- D. Photo of 9311 S. Spaulding with black tarp and Ms. Andrushko's cat in the yard.**
- E. Photo of rabies Vaccination Certificate for Cook County along with dog tags.**
- F. Photo of vaccination record from LaPar Animal Hospital.**
- G. Photo of 9311 S. Spaulding with black tarp blocking dog's view of Ms. Andrushko's yard.**
- H. Photo of 9311 S. Spaulding with white fence blocking dog's view of the alley.**
- I. Photo of 9311 S. Spaulding with white fence blocking dog's view of the alley.**



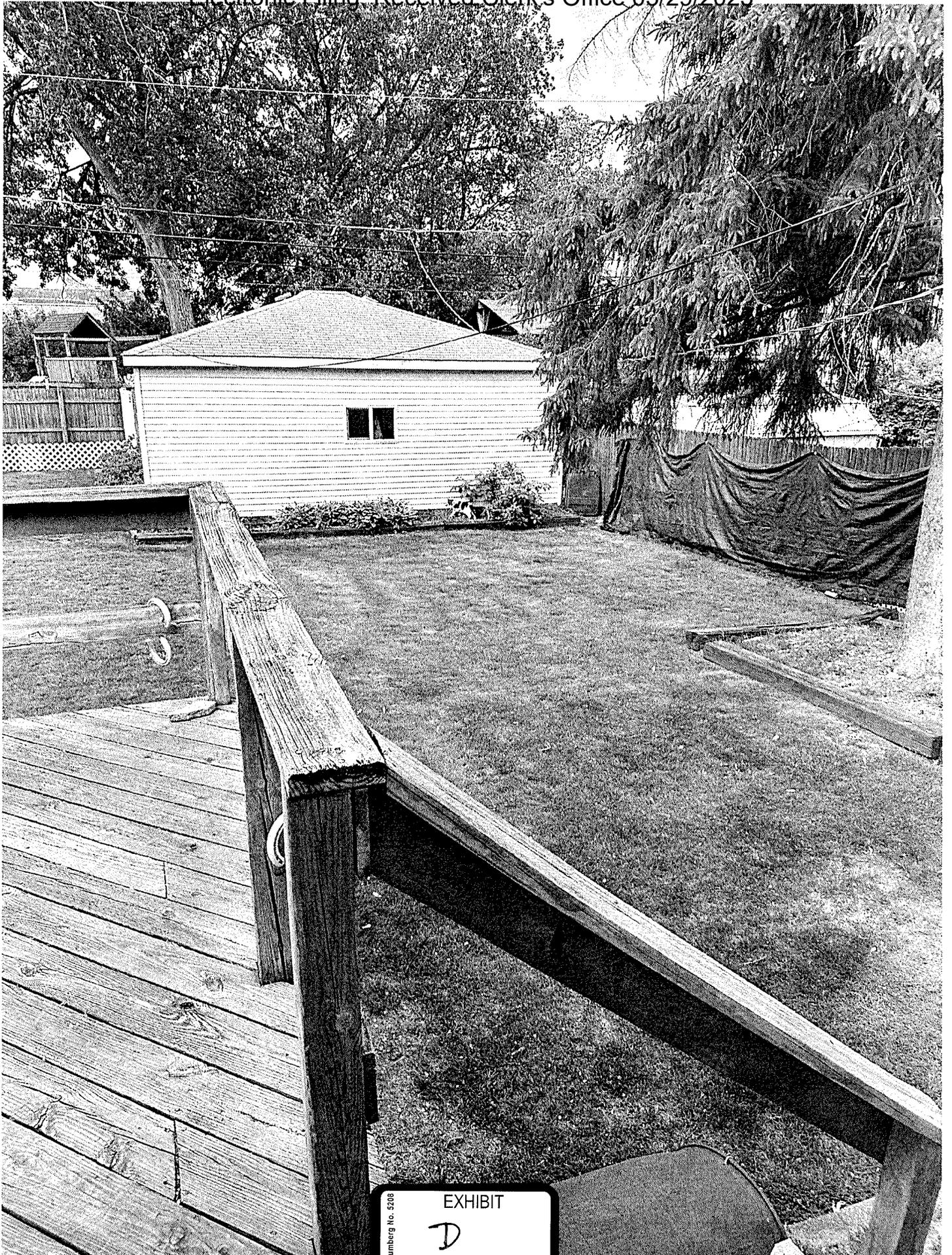
Blumberg No. 5208  
EXHIBIT  
A



Blumberg No. 2208  
EXHIBIT  
B



Blumberg No. 5208  
EXHIBIT  
C



Blumberg No. 2208  
EXHIBIT  
D

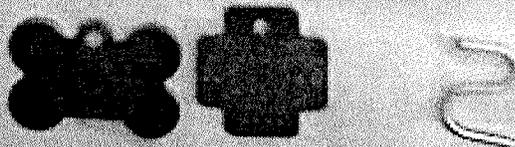
LePar Animal Hospital  
3811 W. 95th St., Evergreen Park, IL 60805  
(708) 423-3200

Thomas Ryan  
3111 S. Spaulding  
Evergreen Park, IL 60805

OFFICIAL, RABIES VACCINATION CERTIFICATE FOR COOK COUNTY, ILLINOIS

DATE VACCINATED	VACCINATION NUMBER	RABIES VACCINATION TAG#
05-29-25	2025-25	73842241
OWNER INFORMATION	Thomas Ryan 3111 S. Spaulding Evergreen Park, IL 60805	PHONE: 708-423-3200
DATE OF BIRTH	05-15-25	SEX: M
PREV. RABIES TAG#		

ISSUED BY: [Signature]      VETERINARIAN: [Signature]      SERIAL # [Number]  
I hereby certify that I have vaccinated this animal in accordance with the Illinois  
Regulations for the Rabies Virus in the State Code.  
LePar Animal Hospital  
3811 W. 95th Avenue  
Evergreen Park, Illinois 60805



Blumberg No. 5208      EXHIBIT  
E

X \_\_\_\_\_

Old balance	Charges	Tax	Payments	Net
0.00	355.52	*1.60	357.12	

Patient	Total charges
Oisin	355.52

Reminders for: <b>Oisin</b> (Weight: 38.9 lbs - 4y)		Last done
03-08-26	Simparica TRIO	03-13-25
03-13-26	Heartworm/Lyme/Ehrlich/Anapl 4	03-13-25
05-02-26	Preventative Care Exam - Canin	05-02-25
05-02-26	Leptospirosis- 4 way vaccine	05-02-25
05-02-26	Bordetella Vaccination, Annual	05-02-25
05-02-26	Intestinal Parasite Test to La	05-02-25
05-01-28	Rabies Canine 3 Year Booster	05-02-25
05-01-28	DA2PP - 3yr	05-02-25

**Doctor's Instructions**

**Rabies Canine 3 Year Booster**

YOUR PET RECEIVED A 3 YEAR RABIES VACCINE TODAY. ALL DOGS AND CATS REQUIRE AN ANNUAL EXAM AND A DISTEMPER VACCINE OR VACCINE TITER. DOGS ALSO REQUIRE AN ANNUAL HEARTWORM TEST.

In compliance with FDA regulation CPG Sec.460.300, we do not allow medication returns and all medication sales are final.

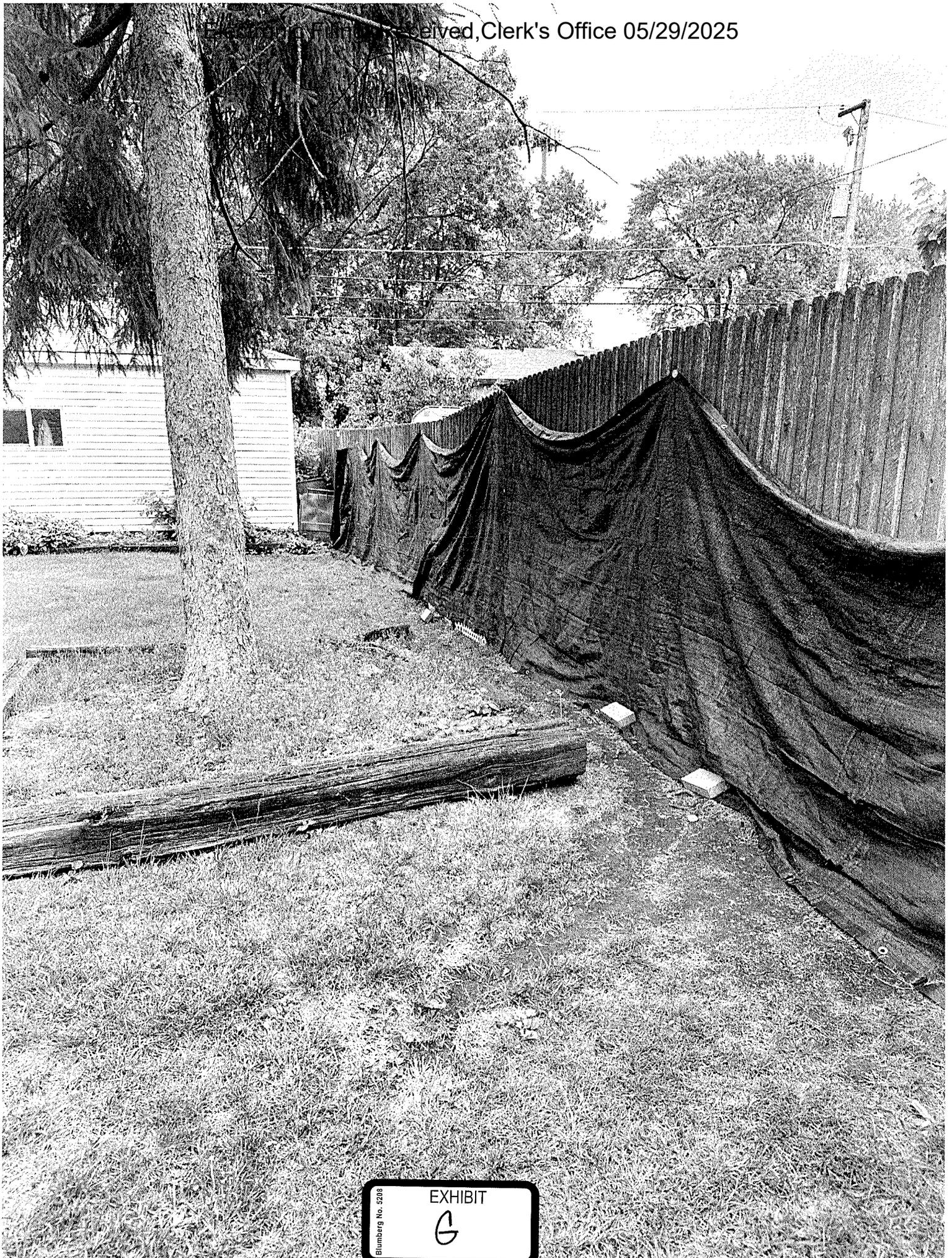
We require 24 hours notice to cancel or reschedule your appointment. This allows us to offer the appointment to another pet in need. Thank you!

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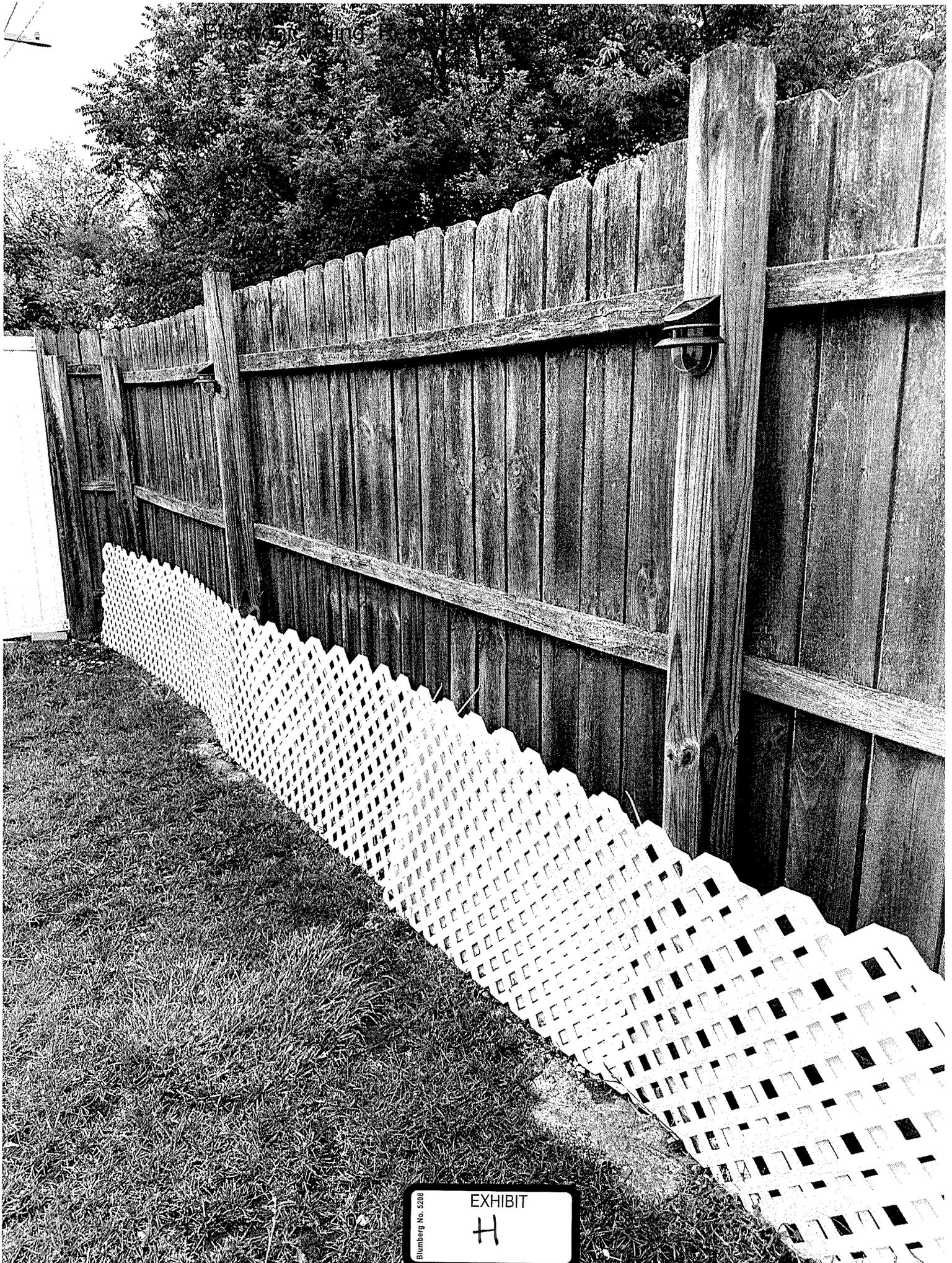
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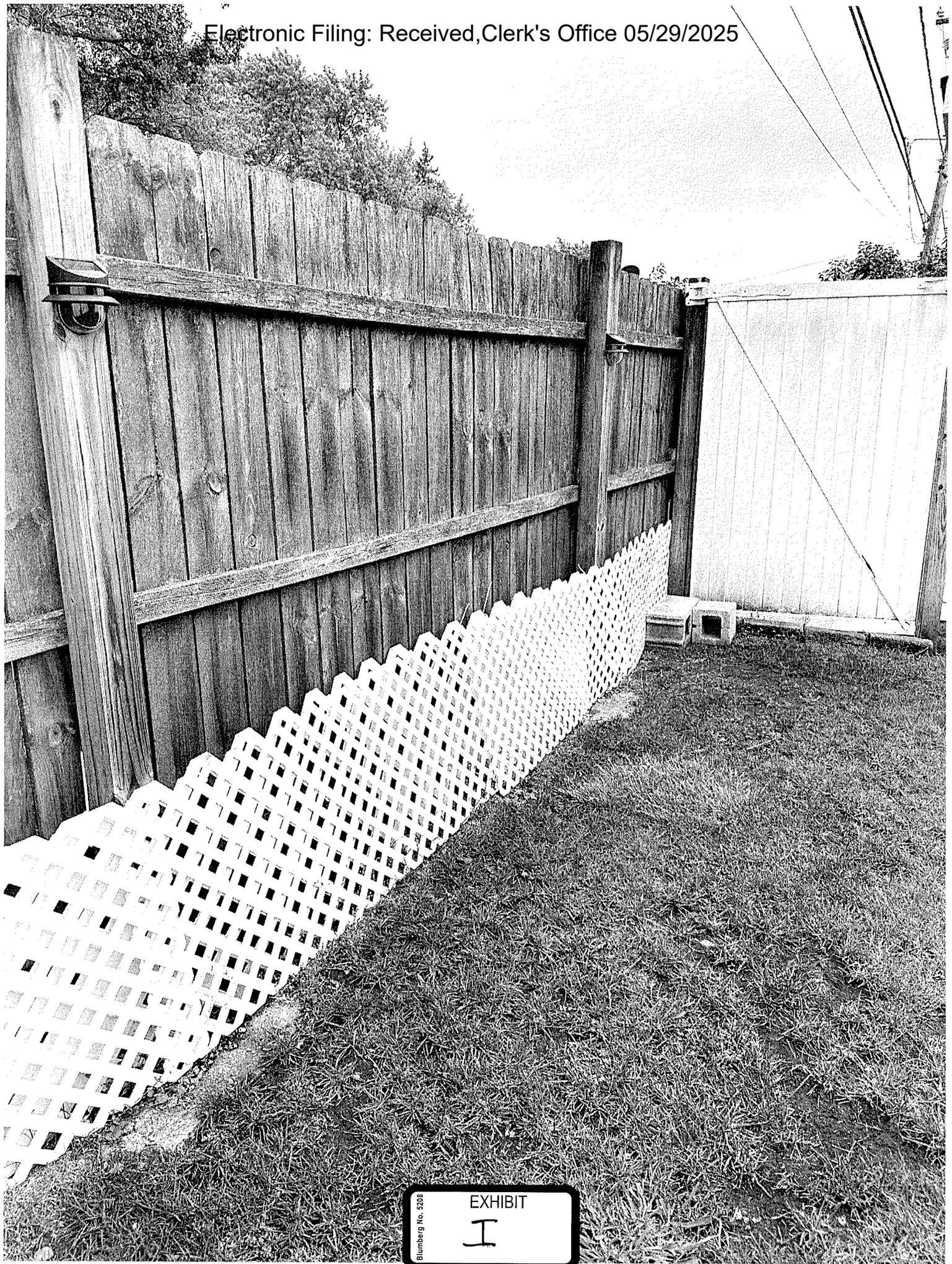
https://drive.google.com/file/d/1hoTETxhH3z55AwgcuxAqP7qsDufmWxG7s/view



Blumberg No. 5208  
EXHIBIT  
G



Blumberg No. 4208  
EXHIBIT  
H



Blumberg No. 2028  
EXHIBIT  
I