

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ILLINOIS ENVIRONMENTAL)	
PROTECTION AGENCY,)	
)	
Complainant,)	AC 2019
)	(IEPA No.: 72-19-AC)
v.)	
)	
BRUCE AND NANNETTE BONTZ, and)	
D. BROOKS EXCAVATING, INC.)	
)	
Respondents.)	

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 STATE OF ILLINOIS
 Pollution Control Board

PETITION FOR REVIEW

Now comes Respondents, BRUCE AND NANNETTE BONTZ and D. BROOKS EXCAVATING, INC., by attorney, DANIEL P. CUSACK, of CUSACK, GILFILLAN & O'DAY, LLC, and for Respondent's Petition for Review, states as follows:

1. An Administrative Citation was served upon Respondents on or about June 12, 2019.
2. The above Respondents did not cause or allow the alleged violations.
3. The alleged violation was the result of uncontrollable circumstances.

WHEREFORE, Respondents respectfully request a hearing to review the Administrative Citation and for such other, further relief as the Hearing Officer deems just and appropriate.

BRUCE AND NANNETTE BONTZ and
D. BROOKS EXCAVATING, INC., Respondent,
by attorneys, CUSACK, GILFILLAN & O'DAY,
LLC.

By 

DANIEL P. CUSACK

CERTIFICATE OF SERVICE AND PROOF OF DELIVERY

Daniel P. Cusack, under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure (735 ILCS 5/1-109), certifies that the statements set forth in this proof of delivery and certificate of service are true and correct, and that he has served a copy of the foregoing Petition for Review, by sending same by *UPS Overnight Mail*, put into the UPS Mailbox with postage paid, deposited on July 15, 2019, into the mailbox located at 411 Hamilton Blvd., Peoria, Illinois 61602, to the following:

Michelle M. Ryan
ATTN: DIVISION OF LEGAL COUNSEL
Assistant Counsel
Illinois Environmental Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

CUSACK, GILFILLAN & O'DAY, LLC

By:



DANIEL P. CUSACK

Attorney for the Respondent

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