BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS,)	
by KWAME RAOUL, Attorney General)	
of the State of Illinois,)	
)	
Complainant,)	
)	
v.) PCB	No. 22-8
) (Enf	orcement - Air)
MOHAMED ELNATOUR, an individual)	
d/b/a Faatima Citgo,)	
)	
Respondent.)	

NOTICE OF FILING

TO: <u>VIA EMAIL</u> <u>VIA EMAIL</u>

Tom Loukas, Esq. Loukas Law, LLC 4061 N. Milwaukee Ave Chicago, IL 60641 773-777-0363 tloukas@loukaslaw.com Bradley P. Halloran
Hearing Officer
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, Illinois 60601
312.814.8917
Brad.Halloran@illinois.gov

PLEASE TAKE NOTICE that on March 18, 2022, the PEOPLE OF THE STATE OF ILLINOIS, filed a Second Revised Certificate of Service of Complaint, a true and correct copy of which is attached hereto and hereby served upon you.

Respectfully submitted,

PEOPLE OF THE STATE OF ILLINOIS, KWAME RAOUL, Attorney General of the State of Illinois

By: /s/ Kathryn A. Pamenter
Kathryn A. Pamenter
Senior Assistant Attorney General
Environmental Bureau
Illinois Attorney General's Office
69 W. Washington St., 18th Floor
Chicago, Illinois 60602
(773) 590-7824
Kathryn.Pamenter@ilag.gov

Electronic Filing: Received, Clerk's Office 3/18/2022

CERTIFICATE OF SERVICE

I, Kathryn A. Pamenter, a Senior Assistant Attorney General, do certify that I caused to be served on this 18th day of March, 2022, the foregoing Notice of Filing and Second Revised Certificate of Service of Complaint upon the persons set forth on the Notice of Filing via email.

/s/ Kathryn A. Pamenter

Kathryn A. Pamenter Senior Assistant Attorney General Environmental Bureau Illinois Attorney General's Office 69 W. Washington St., 18th Floor Chicago, Illinois 60602 (773) 590-7824 Kathryn.Pamenter@ilag.gov

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SECOND REVISED CERTIFICATE OF SERVICE OF COMPLAINT

- I, Kathryn A. Pamenter, a Senior Assistant Attorney General, do certify as to the following:
- 1. On September 27, 2021, I caused to be filed with the Illinois Pollution Control Board Complainant's Complaint in the above-captioned case. The corresponding Certificate of Service provided for service of the Complaint via certified mail as follows:

Mohamed Elnatour d/b/a Faatima Citgo 9229 S. Beloit Avenue Bridgeview, Illinois 60455

Faatima Citgo c/o Mr. Mohamed Elnatour 1530 West 111th Street Chicago, Illinois 60643

- 2. A copy of the Complaint was inadvertently sent via certified mail to the address of 9220 S. Beloit Avenue, Bridgeview, IL 60455, instead of 9229 S. Beloit Avenue, Bridgeview, IL 60455 and, as such, service of Mr. Elnatour at that address did not occur at that time.
- 3. On October 4, 2021, a copy of the Complaint was served at the 1530 W. 111th Street, Chicago, IL 60643 address.

Electronic Filing: Received, Clerk's Office 3/18/2022

- 4. On October 21, 2021, Complainant served a true and correct copy of the Complaint upon opposing counsel via email at <u>tloukas@loukaslaw.com</u>. As such, Complainant did not reattempt service at Mr. Elnatour's 9229 S. Beloit Avenue, Bridgeview, IL 60455 address.
- 5. On February 8, 2022, opposing counsel informed counsel for Complainant for the first time that an ownership change had occurred with respect to the Facility as of March 17, 2017, with Mr. Elnatour transferring the property to Faatima LLC. As such, Complainant's counsel then also learned that the October 4, 2021 service had been made upon Faatima LLC, not Mr. Elnatour.
- 6. Complainant has reached agreement with Faatima LLC with respect to this matter, as reflected in the Motion filed contemporaneously herewith. As such, Complainant is not pursuing its Complaint against, or reattempting service upon, Mr. Elnatour.

/s/ Kathryn A. Pamenter

Kathryn A. Pamenter Senior Assistant Attorney General Environmental Bureau Illinois Attorney General's Office 69 W. Washington St., 18th Floor Chicago, Illinois 60602 (773) 590-7824 Kathryn.Pamenter@ilag.gov