

STATE OF ILLINOIS
ILLINOIS POLLUTION CONTROL BOARD

PAUL CHRISTIAN PRATAPAS,
Petitioner,

Docket No. PCB 2023-079

v.

WINDING CREEK by PULTE
HOMES
&
CITY OF BATAVIA

Respondents.

NOTICE OF FILING

TO: PAUL CHRISTIAN PRATAPAS
1330 E. Chicago Ave
Naperville, IL 60540
Email: paulpratapas@gmail.com

PLEASE TAKE NOTICE that on January 18, 2023, the attached Exhibit 1 to the Motion to Dismiss was filed before the Illinois Pollution Control Board.

Respectfully submitted,

City of Batavia


Roman J. Seckel, City Attorney

Roman J. Seckel, City Attorney
Drendel & Jansons Law Group
111 Flinn Street
Batavia, IL 60510
Email: rjs@batavialaw.com

CERTIFICATE OF SERVICE

I, Roman J. Seckel, Attorney for the City of Batavia, certify that on January 18, 2023, I caused the foregoing NOTICE OF FILING and Exhibit 1 to the Motion to Dismiss to be served on Paul Christian Pratapas and served on the parties below by mailing such documents via the United States Postal Service and via email to the address above.



Roman J. Seckel, City Attorney

to City of Batavia's Motion to Dismiss

Begin forwarded message:

From: Paul Pratapas <paulpratapas@gmail.com>
Date: December 27, 2022 at 3:38:41 AM CST
To: "Newman, Laura" <lnewman@cityofbatavia.net>
Cc: "Drendel, Kevin G." <kgd@batavialaw.com>
Subject: Re: Felony Intimidation and Violation of Civil Liberties by Pulte Homes

Caution: This message originated outside of the City of Batavia -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe. If you have any doubt, contact the sender by phone to confirm.

I already know whatever it says, they will not and are not capable of doing.

You already failed to figure this out yourselves and have several other projects planned which contractors cannot meet environmental regulations for.

The Caseys Gas Station: They are going to need to mix mortar which requires a containment area they cannot and will not create. Look no further than the other Pulte complaints I filed. You approved this project also? Have you seen the nearby Casey's build site by Cantigny? Guess who is also getting a formal complaint?

Based on your behavior, and the behavior of your staff, I will see you at the hearing(s) and will be demanding maximum penalties and to prohibit all additional permitting in Batavia. In large Part because you think you and your attorney are the new gatekeepers. While totally incompetent.

This is fundamental constitutional right and your office does not seem to get the vibe of the law.

On Thu, Dec 22, 2022 at 11:20 AM Newman, Laura <lnewman@cityofbatavia.net> wrote:

Paul:

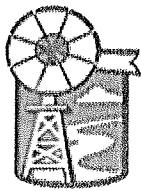
We will make the SWPPP available for you to review in person in our office. My availability is as follows:

Electronic Filing: Received, Clerk's Office 01/18/2023
Tuesday 12/27: 9:30 AM – 11:30 AM

Wednesday 12/28: afternoon

Thursday and Friday 12/29 and 12/30: all day

Please let me know if any of these times will be convenient for you.



Laura Newman

City Administrator | City of Batavia

P: 630.454.2000 C: 224.325.7360 F: 630.454.2001

W: cityofbatavia.net E: lnewman@cityofbatavia.net

100 N Island Ave, Batavia, Illinois 60510

From: Paul Pratapas <paulpratapas@gmail.com>

Sent: Wednesday, December 14, 2022 3:58 PM

To: Newman, Laura <lnewman@cityofbatavia.net>

Cc: Drendel, Kevin G. <kgd@batavialaw.com>

Subject: Re: Felony Intimidation and Violation of Civil Liberties by Pulte Homes

Caution: This message originated outside of the City of Batavia -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe. If you have any doubt, contact the sender by phone to confirm.

Laura,

Your name will be added to the formal complaint with the others. It is being written right now.

Kind Regards,

Paul Pratapas

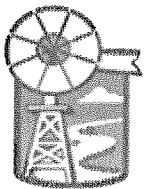
630.696.2843

On Wed, Dec 14, 2022 at 3:41 PM Newman, Laura <lnewman@cityofbatavia.net> wrote:

Dear Mr. Pratapas:

Please direct all further communications regarding this matter to me. I have advised employees not to respond directly to you due to your hostile tone, accusations of illegal behavior and threats of litigation. In the event they receive communication from you, they have been directed to forward it to me. You are entitled to make requests for information under the Freedom of Information Act and the city will provide you with responsive documents according to its legal obligations and as our city attorney advises.

Please be advised that under FOIA, the city has five business days to respond to your request.



Laura Newman

City Administrator | City of Batavia

P: 630.454.2000 C: 224.325.7360 F: 630.454.2001

W: cityofbatavia.net E: lnewman@cityofbatavia.net

100 N Island Ave, Batavia, Illinois 60510