

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

PAUL CHRISTIAN PRATAPAS, )

Complainant, )

) PCB No: 23-14

v. ) (Citizens Enforcement – Water) )

, )

Respondent, )

HORIZON CONSTRUCTION GROUP, INC. )

**NOTICE OF FILING**

**TO:** See Attached Service List

**PLEASE TAKE NOTICE** that on 06.29.2023, PAUL CHRISTIAN PRATAPAS electronically filed with the Office of the Clerk of the Illinois Pollution Control Board

COMPLAINANT RESPONSE TO MOTION FOR DISMISSAL WITH PREJUDICE, copy of which is hereby served upon you.

Paul Christian Pratapas  
Complainant

*Paul Christian Pratapas June 29, 2023*

Paul Christian Pratapas  
paul.pratapas@gmail.com  
1779 Kirby Parkway, STE 1-92  
Memphis, TN 38138  
630.210.1637

06/29/2023  
IPCB 2023-014

Paul Christian Pratapas  
Complainant  
v  
Horizon Construction Group, Inc.  
Respondent

**COMPLAINANTS RESPONSE TO MOTION FOR DISMISSAL WITH PREJUDICE**

WHEREAS Complainant has been functionally homeless and unable to access the proper resources to participate in the case, such as word processing programs, printing and scanning

WHEREAS Respondent physically and verbally refused access to the SWPPP book, site signage and vocalized disregard for the authority of the ILEPA the day prior to an inspection which resulted in a Notice of Non-compliance

WHEREAS Respondent continued violating permit guidelines immediately after receiving an ILEPA letter of compliance which included a picture of non compliance listed as progress

WHEREAS Complainant provided case materials for this and ~24 other cases to the USEPA Inspector Generals Office, The Speaker of The House of Representatives and a Representative of the United Nations to review and provided ample time for such review without interference

WHEREAS Complainant only just gained regular sufficient internet access and a job with the Shelby County Department of Environmental Health to provide funds needed to file, serve, and re-serve documents as a result of mass failure by permit holders to post required signage

WHEREAS the seriousness of the violations and disregard for permit responsibilities require formal attention to prevent future incidents given the signing of contractor certifications under penalty of law while demonstrating a lack of understanding the most basic permit guidelines

WHEREAS the disregard and unawareness has been demonstrated to include the executive offices of Respondent, a multi-state builder

**COMPLAINANT requests Respondent's Motion for Dismissal be denied**

 *Paul Christian Pratapas June 29, 2023*

Paul Christian Pratapas  
1779 Kirby Parkway, Ste 1, #92  
Memphis, TN 38138  
630.210.1637

**CERTIFICATE OF SERVICE**

I, Paul Christian Pratapas, certify that I caused the foregoing COMPLAINANT RESPONSE TO MOTION FOR DISMISSAL WITH PREJUDICE to be served all parties of record, as shown below:

Paul Christian Pratapas  
paulpratapas@gmail.com  
1779 Kirby Parkway, Ste 1, #92  
Memphis, Tennessee 38138  
(630)-210-1637

Illinois Pollution Control Board  
Don Brown - Clerk of the Board  
don.brown@illinois.gov  
100 W. Randolph St. Suite 11-500  
Chicago, Illinois 60601  
(312)-814-3620

Jon Micah Goeller  
Husch Blackwell LLP  
jonmicah.goeller@huschblackwell.com  
120 S. Riverside Plaza, Suite 2200  
Chicago, IL 60606  
(317)-697-3842

by causing a copy of same to be sent via email transmission to the email addresses reflected above, on the 29th day of June, 2023.

Paul Christian Pratapas

Complainant

*Paul Christian Pratapas* June 29, 2023